

ATTACHMENT E

INITIAL STUDY

PROJECT TITLE: Superseding Master Plan and Phase I Buildings for the Navy Broadway Complex (NBC) Project, herein known as the "Project".

APPLICANT: Manchester Financial Group and Manchester Pacific Gateway, LLC

PREPARER OF THE INITIAL STUDY

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PROJECT LOCATION: The Project is located in the City of San Diego, California within the downtown area, in the western area of the City near the San Diego Bay waterfront and is bounded by Broadway on the north, Pacific Highway on the east, and Harbor Drive on the south and west.

PROJECT DESCRIPTION: See Project Description on page 4 of this Initial Study.

PROJECT SETTING: The 1992 Final EIR/EIS for the Navy Broadway Complex (NBC) describes the existing setting of the NBC. This description is hereby incorporated by reference.

The 14.7-acre NBC site houses the Commander, Navy Region Southwest (CNRSW), the Navy Fleet Industrial Supply Center (FISC), and several other Navy administrative uses, and is central to other military installations, including Naval Base Point Loma, Naval Base Coronado, and Naval Station San Diego. Constructed between 1921 and 1944, the Complex currently has 860,678 sf of administrative and warehouse space that is located in two large and six smaller buildings. The southern and eastern parts of the property were previously developed with many structures that have since been demolished, and nearly half of the site is presently used for parking.

Downtown San Diego has a diverse mix of land uses, including working port activities, industrial complexes, cultural facilities, retail stores, offices, residences

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and civic buildings. The NBC is adjacent to the San Diego Bay waterfront and is surrounded by a mix of urban uses, including the USS Midway, several piers, a cruise ship terminal, and a landscaped embarcadero promenade to the west; a large public parking lot to the north, known as Lane Field and planned for redevelopment with hotel and retail uses; hotel, residential, commercial, and retail uses to the east; and Seaport Village, a retail destination, to the south. The San Diego Convention Center is located to the southeast of Seaport Village. NAVFEC Southwest is located on the Pacific Highway, approximately 1,300 feet north of the NBC, and the surrounding neighborhoods have experienced residential development recently, including both mid-rise buildings and high-rise towers.

RELEVANT ENVIRONMENTAL REVIEW DOCUMENTS:

Since the Project was originally approved in 1992, the City has approved several large scale planning and development proposals for the Downtown area that relate to and incorporate buildout of the Project. Specifically, the Project has been considered or was assumed in the 1992 NBC Project EIR/EIS, the 1992 Final Master EIR for the Centre City Redevelopment Project, the 1999 Final Subsequent EIR for the Ballpark and Ancillary Development Projects, the 2000 North Embarcadero Visionary Plan EIR, and the 2006 Downtown Community Plan Final EIR (collectively, the "Environmental Documents"). In addition, in 2006, the U.S. Navy prepared an Environmental Assessment that considered the environmental effects of implementing the Development Agreement, pursuant to the Navy's obligations under federal environmental law (National Environmental Policy Act). Each of the documents identified below is hereby incorporated by reference into this Initial Study.

*Navy Broadway Complex Final Environmental Impact Report
(EIR)/Environmental Impact Statement (EIS) (Joint CEQA/NEPA
Document)*

In 1990, a Draft Environmental Impact Statement/Environmental Impact Report (EIR/EIS) for the Navy Broadway Complex Project by the U.S. Navy and the City of San Diego. The documents were circulated simultaneously and incorporated each other by reference. The Final EIR/EIS was certified in 1992 and included an evaluation of potential impacts of development of the NBC Project as proposed by the Development Agreement between the City of San Diego and the U.S. Navy. The Final EIR/EIS included an evaluation of potential impacts of the NBC Development Agreement, including evaluations of Land Use, Transportation/Circulation, Aesthetics and Viewshed, Public Services and Utilities, Socioeconomic (i.e., population, housing, and employment), Geology

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and Seismicity, Hydrology, Biological Resources, Air Quality, Noise, Cultural Resources, Public Health and Safety and Cumulative Impacts and Growth Inducing Impacts.

Final Master Environmental Impact Report (MEIR) for the Centre City Redevelopment Project

The Centre City Redevelopment Project involved an update of the then-existing Centre City Community Plan and adoption of related ordinances, including the Centre City Parking Ordinance, the Centre City Transit Ordinance, the Centre City Streetscape Manual, and the approval of a corresponding amendment to the City's Local Coastal Program. The Project area encompasses approximately 1,540 acres and covers four sub areas: Columbia Sub Area, Marina Sub Area, Gaslamp Quarter Sub Area, and the Expansion Sub Area. The Community Plan encompasses approximately 1,538 acres. The Community Plan provided overall standards, criteria, and objectives for development in the Centre City Area.

On April 8, 1992, the Redevelopment Agency and the City Council certified the Final Master Environmental Impact Report (MEIR) for the Centre City Redevelopment Project and adopted a Mitigation, Monitoring and Reporting Plan for the Project. The 1992 MEIR specifically identified the NBC Project within the Land Use section on Page 4.A-17 as follows: "...redevelopment of 1 million square feet of Navy offices; up to 2.5 million mixed commercial, office, and hotel uses, and a plaza at Broadway and Harbor Drive." The MEIR assumed development of the NBC Project in the Land Use Impact analysis and anticipated mitigation associated with Transportation/Circulation/Parking, Air Quality, Cultural Resources and other Project specific measures necessary to reduce potential impacts to a less than significant level.

Final Subsequent Environmental Impact Report (SEIR) to the 1992 Final Master Environmental Impact Report Addressing the Centre City Community Plan and Related Developments for the Proposed Ballpark and Ancillary Development Projects

The Ballpark and ancillary development projects proposed to redevelop approximately 75 acres within the East Village south of Market Street adjacent to the Gaslamp Quarter and across from the Convention Center. The project includes redevelopment surrounding the ballpark, such as residential lofts, restaurants, shops, entertainment, cultural activities, and conference facilities. The ballpark represents the central element of the Ballpark Project and covers approximately 15

acres. The ballpark provides fixed seating for approximately 42,500 fans, plus an additional capacity of 3,500 in the "Park at the Park." The ballpark includes two "garden buildings." These buildings are connected to the ballpark through bridges and walkways and include concessions, retail uses, ticket offices, business offices, and parking, amounting to a total of 259,000 sf. Other facilities include a 3,000-sf auditorium and 3,000-sf Hall of Fame/Interactive Learning Center. A series of parking facilities, one parking structure and four surface lots, will provide approximately 2,383 parking spaces.

The Redevelopment Agency and the City Council certified a Final Subsequent Environmental Impact Report (SEIR) on October 26, 1999, as a supplement to the MEIR, addressing the Centre City Community Plan and Related Documents for the proposed Ballpark and ancillary development projects. The SEIR incorporated by reference the NBC EIR/EIS. The SEIR did not specifically identify the NBC Project as a project under its Land Use or Cumulative discussion sections. However, to determine the short-term and longer-term cumulative impacts with or without the Ballpark and ancillary development projects, the SEIR assumed buildout of the Redevelopment Project Area as defined in the 1992 Master Environmental Impact Report (MEIR) for the Centre City Redevelopment Project, which included the NBC project.

Because the 1992 MEIR included the NBC project, the same and/or similar intersection, ramp and roadway segment impacts were assumed in the SEIR's traffic analysis. Additionally, the SEIR analyzed air quality using the Regional Air Quality Standards (RAQS) for the San Diego Air Basin. Mitigation included an Event Transportation Management Plan, Freeway Deficiency Plan, Parking Management Plan and Transit improvements.

North Embarcadero Visionary Plan Environmental Impact Report

In 1997, CCDC, along with the City, the County of San Diego, the San Diego Unified Port District and the Navy, formed the Embarcadero Alliance to draft, endorse and adopt a new plan for the waterfront area west of the railroad right-of-way and Laurel Street to the north, and Harbor Drive to the south. The plan area covers approximately 295 acres and includes both land and water areas. The resultant North Embarcadero Visionary Plan ("Visionary Plan") has two main objectives: to install a variety of public improvements to beautify the area to encourage new development and to prescribe regulatory standards that contribute a unified development pattern to the waterfront. The Visionary Plan and the NBC Development Agreement are similar in substance and intent, in part because the Visionary Plan is also based on the Central Bayfront Design Principles.

In March 2000, the Board of Port Commissioners of the San Diego Unified Port District certified the Environmental Impact Report for the Visionary Plan. The Visionary Plan EIR evaluated, on a programmatic level, impacts associated with implementation of the Visionary Plan, and project-specific analysis for subsequent projects proposed under the Visionary Plan. The Visionary Plan EIR was intended as a type of first-tier EIR to be used to streamline the CEQA process for subsequent projects that are proposed under a larger programmatic action. The Visionary Plan EIR identifies the NBC Project as an exiting entitled project for comprehensive planning purposes and cumulative analysis.

Downtown Community Plan Environmental Impact Report in Conjunction with the new Downtown Community Plan, new Centre City Planned District Ordinance and Tenth Amendment to the Redevelopment Plan for the Centre City Redevelopment Project.

In February 2006, the San Diego City Council adopted an update to the Downtown Community Plan. The Downtown Community Plan replaces the Centre City Community Plan, adopted in 1992. The Community Plan is part of the City's Progress Guide and General Plan and provides an overall framework for development by defining land use types and building intensities, the transportation system, recreational opportunities and urban design. In order to reflect the changes contained in the Downtown Community Plan, the Centre City Redevelopment Plan was also amended for consistency. The primary revisions resulted from replacing descriptions of land use districts to be consistent with the Downtown Community Plan, and to revise estimates of residential population and number of residential units in the Redevelopment Area.

The Redevelopment Agency and the City Council certified the Downtown Community Plan EIR on February 28, 2006. The Community Plan EIR assumed development of the NBC Project in the Project Description and incorporated anticipated land uses and building square footage into the figures and impact analysis. The EIR also anticipated mitigation for direct impacts associated with Transportation/Circulation/Parking, Air Quality, Cultural Resources and other project specific measures necessary to reduce potential impacts to below a level of significance, as well as cumulative impacts to Air Quality and Transportation.

2006 Environmental Assessment for Navy Broadway Complex

In 2006, the United States Navy prepared an Environmental Assessment (EA) for the Navy Broadway Complex in accordance with the Council on

Environmental Quality (CEQ) regulations, 40 C.F.R. Part 1500; the National Environmental Policy Act (NEPA), 42 USC § 4321; and other environmental regulations pertinent to the Navy. (See 2006 EA, p. ES-1.) The purpose of the EA was to consider the environmental effects of the implementation of the Development Agreement because, unlike in the early 1990s, market conditions in 2006 were favorable to the types of development contemplated by the Development Agreement. (2006 EA, p. ES-3.) Although the EA is a NEPA document, and not a CEQA document, the EA provides recent, relevant information regarding the environmental effects associated with implementation of the Development Agreement. The information presented in the EA was therefore considered in the preparation of this Initial Study and is incorporated herein by reference.

SEE ATTACHED CHECKLIST FOR MORE INFORMATION ABOUT CONTENTS OF ENVIRONMENTAL DOCUMENTS.

DETERMINATION: The primary purpose of this Initial Study is to evaluate the potential environmental effects of the proposed Project.

This Initial Study is intended to determine if the proposed Project and additional detail provided, beyond that analyzed in the Environmental Documents described above, meet any of the requirements for preparation of a Subsequent or Supplemental Environmental Documents per Public Resources Code Section 21166 and Sections 15162-15164 of the State California Environmental Quality Act (CEQA) Guidelines. These sections of the CEQA Guidelines would require a Subsequent or Supplemental EIR if any of the following conditions apply:

- Substantial changes are proposed in the project which will require major revisions of the previous EIRs due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects
- Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIRs due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at

the time the previous EIRs were certified as complete, shows any of the following:

- The project will have one or more significant effects not discussed in the previous EIRs;
- Significant effects previously examined will be substantially more severe than shown in the previous EIRs;
- Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIRs would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Initial Study determines that the conditions described in CEQA Guidelines Section 15162 have not occurred. The Project consists of a Superseding Master Plan, which replaces the previous Master Plan found to be consistent with the Development Agreement, and the Phase I Buildings. The Project has been reviewed by CCDC Staff, who have recommended that the Project be found consistent with the Development Agreement on which all previous environmental determinations have been made. There are no new significant environmental impacts and there is not an increase in severity of a previously identified significant effect. Moreover, the circumstances under which the Project is undertaken have not changed such that major revisions to the Environmental Documents are needed. Specifically, there are no new significant impacts or a substantial increase in the severity of previously identified significant effects. Lastly, there is no new information of substantial importance that indicates:

- that the Project will have new significant effects;
- that significant effects previously examined will be substantially more severe than shown in the previous EIRs;
- that mitigation measures previously found infeasible would be feasible, and would reduce one or more significant effects of the Project, but the Project proponents decline to adopt it, or
- mitigation measures or alternatives which are considerably different from those analyzed in the previous EIRs would substantially reduce one or more significant effects of the Project, but the Project proponents decline to adopt the mitigation measure or alternative.

The discussion of potential impacts in the Initial Study Checklist specifically addresses the potential for new or more severe impacts with regard to each resource area. Based on the criteria established under CEQA Guidelines Section 15164, this Initial Study determines that no Subsequent or Supplemental EIR is required.

MITIGATION: Certain policies or programs (mitigation measures) were required in, or incorporated into the Navy Broadway Complex Project in connection with certification of the Environmental Documents. Mitigation measures included in the Environmental Documents require future permit-specific implementation. As part of the City of San Diego's mitigation and monitoring and reporting obligation under State law, and pursuant to the Mitigation, Monitoring, and Reporting Program of the Environmental Documents, certain mitigation measures that were included in the Environmental Documents will be required if and when the proposed Project is approved.

INITIAL STUDY ANALYSIS

I. PROPOSED PROJECT DESCRIPTION

Location

The site of the Project is located in the City of San Diego, California within the downtown area. The Project is located in the western area of the City near the San Diego Bay waterfront. It is bounded by Broadway on the north, Pacific Highway on the east, and Harbor Drive on the south and west. The NBC, which consists of approximately 14.7 acres, is located on eight city blocks. The eight city blocks are consolidated into four larger blocks, with each bounded by Pacific Highway on the east and Harbor Drive on the west, and separated by the extension of E, F, and G streets. (See attached project location map.)

Project Description

The proposed activity for the purposes of this Initial Study is approval of the Superseding Master Plan and Phase I Buildings for the Navy Broadway Complex project. The Superseding Master Plan is intended to serve as a guide and long-term outline for implementing the 1992 Development Agreement entered into between the U.S. Navy and the City of San Diego. The proposed Superseding Master Plan is intended to be consistent with the NBC Development Agreement, conform to the Downtown Community Plan, and advance the policies and goals of

the Visionary Plan and the objectives of the Centre City Redevelopment project. The proposed Superseding Master Plan is also designed to incorporate the fundamental elements of the Central Bayfront Design Principles (view corridors, waterfront public access and stepping development "down" to the Bay). The Project boundaries remain the same and all the components of the original project have been carried forward that were identified in the Development Agreement and analyzed by the Environmental Documents. The main components of the proposed Superseding Master Plan include:

- A maximum of 2,893,434 gross square feet of above-grade development. This figure is 356,566 gross square feet less than the maximum building area allowed.
- 25,000 sf of independent retail space;
- 1.9 acres of formal open space;
- Primary uses include office, hotel, retail, public attraction, and parking uses (and retail associated with each of these uses).
- Museum space in two locations on Block 4 with a combined total square footage of 40,000. This is the minimum gross square feet of public attractions, such as museums, allowed.
- 2,988 parking spaces to serve the allocation of uses in the Project. This is 117 spaces less than the Final EIR/EIS estimation of 3,105 on-site parking spaces to be allowed with full build out of the Project.

Project component	Minimum or Maximum per Development Agreement	Proposed Superseding Master Plan	Difference
Office	1,650,000 sf Max	1,646,793 sf	-3,207 sf
Hotel	1,220,000 sf Max (1,500 rooms Max)	1,181,641 sf (1,575 rooms)	-38,359sf (+75 rooms)
Retail	25,000 sf Max	25,000 sf	--
Public Attraction	40,000 sf Min 55,000 sf Max	40,000 sf	--

Total sf	3,250,000 sf Max	2,893,434 sf	-356,566 sf
Open Space	1.8 acres Min	1.9 acres	+ .9 acres
Parking	3,105 Max	2,988	-117

The Phase I Buildings consist of independent consistency reviews of four individual buildings within the NBC project. These buildings may be summarized as follows:

Building 2A: A 13-story, 200-foot tall building containing 296,535 square feet of office space and supporting retail space.

Building 2B: A 28-story, 350-foot tall building containing 384,324 square feet of office space and 555,826 square feet of hotel space (approximately 943 rooms), including supporting retail space.

Building 3A: A 10-story, 150-foot tall building containing 195,070 square feet (approximately 193 rooms) plus 16,000 square feet of independent retail space.

Building 3B: A 17-story, 250-foot building containing 351,000 square feet of Navy office space.

II. ENVIRONMENTAL ANALYSIS: See attached Environmental Checklist/Initial Study.

III. SUMMARY OF FINDINGS: The following findings are derived from the environmental assessment documented by this Initial Study and the previous Environmental Documents:

1. No substantial changes are proposed in the Navy Broadway Complex (NBC) Development Agreement and the Environmental Document's Mitigation Monitoring and Reporting Program (MMRP), or with respect to the circumstances under which the Project is to be undertaken as a result of the proposed Superseding Master Plan and Phase I Buildings, which will require important or major revisions in the Final EIR/EIS for the NBC Project;
2. No new information of substantial importance to the NBC Development Agreement has become available that was not known or could not have been known at the time the Environmental Documents were certified as complete, and that shows that the

Project will have any significant effects not discussed previously in the Environmental Documents, or that any significant effects previously examined will be substantially more severe than shown in the Environmental Documents, or that any mitigation measures or alternatives previously found not to be feasible or not previously considered would substantially reduce or lessen any significant effects of the NBC Project on the environment;

3. No Negative Declaration, Subsequent EIR, or Supplement to the Environmental Documents is necessary or required;
4. The proposed Superseding Master Plan and Phase I Buildings will have no significant effect on the environment, except as identified and considered in the Environmental Documents. No new specific mitigation measures are required.

IV. EVALUATION OF ENVIRONMENTAL IMPACTS

This section evaluates the potential environmental effects of the proposed Superseding Master Plan and Phase I Buildings using the environmental checklist from the CEQA Guidelines as amended in September 2004. The conclusions drawn regarding the degree of the impact are based on a comparison of the effects of the proposed activity with the results and conclusion of the Environmental Documents, as well the 1992 Development Agreement executed for the NBC project.

A "Not Significant" response indicates that, although impacts or changes in the environment may occur, the impact would be below a level of significance or the impact would not apply to the proposed Project. A response of "Significant but Mitigated" indicates that incorporation of mitigation measures identified in the Mitigation Monitoring and Reporting Plan for the Environmental Documents would reduce the impact of the proposed Project to below a level of significance. A response of "Significant and Not Mitigated" indicates that the findings conclude that the impacts of the Project would remain significant even with implementation of the mitigation measures identified in the Mitigation Monitoring and Reporting Plan for the Environmental Documents. A response of "Significant and Not Mitigated" does not indicate that the impact of the proposed activity would be greater than assumed in the Environmental Documents nor does it imply that the impact was not considered in the Environmental Documents.

For each response category, assessments are determined on a Direct ("D") and Cumulative ("C") basis. A direct impact is the result of the Project impact solely within the Project area. A cumulative impact is the result of the Project impact on a regional scale, in combination with impacts assumed from other Projects in the region and vicinity.

The following table lists each potential environmental effect and provides information supporting the conclusion drawn as to the degree of impact associated with the proposed activity.

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
1. AESTHETICS/VISUAL QUALITY:						
<p>(a) Substantially disturb a scenic resource, vista or view from a public viewing area, including a State scenic highway or view corridor designated by the Downtown Community Plan?</p> <p><i>Views of scenic resources, such as San Diego Bay, San Diego-Coronado Bay Bridge, Point Loma, Coronado and the downtown skyline are considered an important downtown asset. According to the Navy Broadway Complex Final EIS/EIR (Final EIR/EIS), the Project site is in a visually important area because of its proximity to the waterfront and its visibility from several key viewpoints. The NBC site can be viewed from areas across the bay to the northwest, west, and south including long-range views from Point Loma. According to the Final EIS/EIR, the types of views associated with the NBC project include:</i></p> <ul style="list-style-type: none"> <i>Panoramic views from Coronado and Harbor Islands across the bay.</i> <i>Gateway views from Harbor Drive at Laurel Street and I-5 at Olive Street looking south, and from Harbor Drive looking north;</i> <i>Street-end views from the downtown along Broadway, E, F, G, and Market streets.</i> <p><i>No designated scenic resources actually exist within the Downtown planning area except for a small portion of State Designated Scenic Highway 163. Nevertheless, views</i></p>					X	X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>of the San Diego Bay from downtown are considered a significant downtown asset. Distant views and a sense of expansiveness are especially critical to balance the planned high development intensities. Several streets surrounding the NBC have been designated as public view corridors in the Downtown Community Plan, including Pacific Highway; Broadway; and E, F, and G streets.</i></p> <p><i>The Urban Design Guidelines of the Development Agreement are intended to ensure high-quality design of the NBC. The quality of the design has a direct correlation with the quality of the visual environment. As the North Embarcadero Alliance Vision Plan (NEAVP) and Downtown Community Plan planning efforts were completed subsequent to the Development Agreement, many design elements of the Development Agreement were incorporated into those plans. As required by the Development Agreement, the Project incorporates and is consistent with the Urban Design Guidelines.</i></p> <p><i>The Development Agreement provides that towers must be designed as slender structures to minimize view obstruction from inland areas, and to create a well-composed skyline compatible with existing development.</i></p> <p><i>The Project includes seven proposed buildings with forms that qualify as "towers," five along Pacific Highway and two along Harbor Drive. The three tallest towers are located on block 1 and 2 and each is 75-feet wide respectively, considerably less than</i></p>						

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>the maximum allowed; the narrow sides of their rectangular plans are oriented to the east, minimizing views from the inland. Individual buildings respond to the detail of their location and not a formula of massing, to provide generally better views, sunlight access and design variety. Regarding "compatible with existing development," see (b) below.</i></p> <p><i>Implementation of the Project would enhance and/or be visually compatible with the surrounding area. Views of the site from Harbor Island would be in character with the high rise development of downtown. Modern buildings and installation of landscaping along Pacific Highway would improve the quality of views along Pacific Highway, the major public view corridor in the Downtown Community Plan. From the G Street Mole, views of the redevelopment would be compatible with the surrounding buildings of downtown. The USS Midway would continue to be a dominant feature from this view. The proposed Project would be visually compatible with the existing high-rise development viewable from Centennial Park in Coronado. Views from the E Street corridor would be improved as the street would be opened to pedestrian and vehicular traffic from downtown to the waterfront.</i></p> <p><i>In addition, to ensure that visual resources are protected, the Downtown Community Plan outlines design criteria to preserve and reinforce the existing views and to capture new views as redevelopment on large waterfront parcels, such as the NBC, occurs. Such view policies include:</i></p>						

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<ul style="list-style-type: none"> • Extending the downtown street grid system from E, F, and G streets, to the waterfront and other large sites as they are redeveloped. • Prohibit full or partial street closures by new buildings; the only enable use of a street closure would be a park or public open space; • Protecting public views of the water, and reestablish water views; and • Prohibiting the construction of "sky-walks" or any visible structure in view of corridors. <p>The Project conforms with view policies of the Downtown Community Plan. Therefore, the direct and cumulative impacts of the Project to views of scenic resources from public viewing areas would not be significantly different from the conclusions of the Final Environmental Impact Report (EIR)/Final Environmental Impact Statement (EIS) (Joint CEQA/NEPA document) (the "Final EIR/EIS"); the 2000 North Embarcadero Visionary Plan Final Master EIR (the Visionary Plan Final MEIR"); the 1992 Final Master EIR for the Centre City Redevelopment Project (the "Final MEIR"); the 1999 Final Subsequent Environmental Impact Report to the MEIR for the Centre City Redevelopment Project (the "Final SEIR"); and the 2006 Downtown Community Plan, Centre City Planned District Ordinance, and 10th Amendment to the Redevelopment Plan For The Centre City Project Area Final EIR (the "Community Plan Final EIR") (collectively, the "Environmental Documents").</p>						

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>The proposed Project does not include any component that would substantially disturb the existing visual character of the Downtown/Marina area, including the small portion of the State Designated Scenic Highway 163. Thus the impact of the proposed Project on visual character of the area would not be significant.</i>						
<p>(b) Substantially incompatible with the bulk, scale, color and/or design of surrounding development?</p> <p><i>The Project includes seven towers. Three of the seven towers are 235 feet long east-west, creating tower wall planes that are large in comparison with existing downtown towers, which typically do not exceed 200 feet. Nevertheless, these towers are narrow in the critical north-south direction, which is comparable to existing and currently under construction towers near the site, and to the majority of existing and planned towers in downtown.</i></p> <p><i>The Master Plan includes the site plan/ground level usage; circulation; and basic massing, volumes, and forms of buildings in order to verify required building constraints are observed. The architectural vocabulary of forms and materials are established as individual buildings are brought forward for a Consistency Determination at the first stage of review (Basic Concept/Schematic Drawings). Because the Project is proposed to be developed in phases, buildings in Phase 1 will be</i></p>					X	X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>reviewed against each other and Phase 2 buildings will be reviewed both against each other and also with Phase 1 to ensure the design creates a visually harmonious grouping of buildings, both within the NBC and surrounding development.</i></p> <p><i>Therefore, the direct and cumulative visual impacts of the proposed Project on the surrounding development would be less than significant.</i></p>						
<p>(c) Substantially affect daytime or nighttime views in the area due to lighting?</p> <p><i>As described in the Final EIR/EIS, climate in Downtown San Diego is characterized as moderate year-round. The influence of shade from buildings is not as critical an issue as it is in areas with temperature extremes, where shade can moderate extremely high temperatures and reduce already cool or cold weather.</i></p> <p><i>The primary area of shading from existing project structures is towards the north and northeast, where shadows are cast during the warmest part of the day on the winter solstice. The winter solstice is considered important because it is the day when shadows are at their longest, and it occurs during the cooler part of the year. The Final EIR/EIS concluded that due to the current low height of project structures, with no building higher than 150 feet, no substantial shadows are created during the winter solstice. Although three of the towers proposed in the Project exceed 200 feet, as further</i></p>					X	X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>explained in the Final EIR/EIS, the casting of shadows in moderate climate areas, such as the project area, is not necessarily adverse. In fact, shading can provide a moderate effect on hotter summer temperatures, and would be considered beneficial to public uses in the warmer times of the year. During the cooler times, temperatures are moderate enough that shading would not be considered substantially adverse. (Final EIR/EIS, p. 4-114.)</i></p> <p><i>The City of San Diego's Light Pollution Law (Municipal Code Section 101.1300 et seq.) protects nighttime views (e.g. astronomical activities) and light-sensitive land uses from excessive light generated by development in the downtown area. Since any development proposed under the Project would be subject to the City's Light Pollution Law, the direct and cumulative impacts to daytime and nighttime views due to lighting would not be significant, consistent with the findings of the Environmental Documents.</i></p> <p><i>Therefore, no direct or cumulative effects on nighttime views or lighting would occur as a result of the Project not previously analyzed in the Environmental Documents.</i></p>						
2. AGRICULTURAL RESOURCES						
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use?					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>Downtown San Diego is an urban environment that does not contain land designated as prime agricultural soils by the Soils Conservation Service, nor does it contain any farmlands designated by the California Department of Conservation. Therefore, no impact to agricultural resources would occur.</i>						
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? <i>The Navy Broadway Complex does not contain, nor is it near, land zoned for agricultural use or land subject to a Williamson Act Contract pursuant to Section 51201 of the California Government Code. Therefore, impacts resulting from conflicts with existing zoning for agricultural use or a Williamson Act contract would not occur.</i>					X	X
3. AIR QUALITY						
(a) Conflict with or obstruct implementation of an applicable air quality plan, including the County's Regional Air Quality Strategies or the State Implementation Plan? <i>The Final EIR/EIS found that the NBC Project would be consistent with the then-current (1982) and proposed SIP, and that the Project would therefore not have a significant impact. (Final EIR/EIS, p. 4-172.)</i>					X	X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>Further, the Downtown Community Plan EIR, approved in 2006, analyzed air quality impacts associated with development in the Downtown area, including the NBC project, and found that although implementation of the proposed Plan would substantially increase the air emissions generated from downtown with respect to current levels, the proposed land use plan would not conflict with regional air quality planning because it would implement many of the strategies and policies established by regional plans to reduce air pollution. Most notably, the mixed-use emphasis would implement an important technique to reduce mobile source emission by co-locating housing and employment opportunities. In addition, the downtown area is well-served by a variety of transit opportunities including light rail (the Trolley), commuter trains (the Coaster) and bus service. BRT service planned for downtown would also reduce mobile source emissions in the SDAB.</i></p> <p><i>More specifically, the proposed Community Plan represents "smart growth" that would achieve the following strategies identified by the San Diego Air Pollution Control District:</i></p> <ul style="list-style-type: none"> <i>Designate future transit corridors and rail station sites as "Transit Focus Areas," and zone such areas for compact, pedestrian-oriented development;</i> <i>Incorporate residential uses in existing employment areas;</i> 						

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<ul style="list-style-type: none"> Designate a central business core and direct commercial uses there, enabling ridesharing and daytime worker errands on foot; and Promote revitalization and infill development in mixed use core areas. <p>Therefore, the proposed Community Plan would be consistent with air quality/land use planning strategies and regional air quality planning. (Downtown Community Plan Final EIR, p. 5.8-5.)</p> <p>The proposed Project is consistent with the NBC Development Agreement and conforms to the Downtown Community Plan. The project boundaries are the same and all the components of the original project have been carried forward that were identified in the 1992 Final EIR/EIS and Development Agreement. The main components of the proposed Project include a reduction in the maximum gross square feet of above-grade development, inclusion of a museum and a change in the number of parking spaces. The Project remains consistent with the strategies identified by the Downtown Community Plan EIR and will be consistent with air quality/land use planning strategies and regional air quality planning. Therefore, the direct and cumulative visual impacts of the proposed Project on the surrounding development would not be significantly different from the conclusions of the Final EIR/EIS and the impact remains less-than-significant.</p>						
(b) Generate or expose sensitive receptors to substantial air contaminants including,		X			X	

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>but not limited to, criteria pollutants, smoke, soot, grime, toxic fumes and substances, particulate matter, or any other emissions that may endanger human health?</p> <p><i>The Final EIR/EIS for the NBC Project and the Final EIR for the Downtown Community Plan indicate that the Project would result in potential air quality impacts related to air emission generators and receptors. Specifically, both identify potential impacts associated with construction related activities. However, with incorporation of mitigation measures, any construction related impacts will be less than significant. (Final EIR/EIS, p. 4-209; Downtown Community Plan Final EIR, pp. 5.8-11-5.8-13.)</i></p> <p><i>In addition, mobile source emissions are identified as potentially significant. The Downtown Community Plan includes a number of goals and policies to reduce reliance on automobiles which would reduce mobile source emissions and these will apply to the Project. (Downtown Community Plan Final EIR, pp. 5.8-9 to 5.9-10.)</i></p> <p><i>The San Diego Air Basin is currently classified by the US EPA as a non-attainment area for ozone and PM10. All new development in the San Diego Air Basin compounds these problems by creating more emissions. New development within the downtown planning area would be no exception, creating long-term air emissions related primarily to increased vehicular use and short-term dust during construction. Because the San Diego Air Basin already is impacted, any new development would have a significant</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>cumulative impact on regional air quality. Thus, implementation of the proposed Downtown Community Plan would result in a significant cumulative air quality impact. Although the proposed Plan would concentrate development in an area which is well served by transit and offers a variety of opportunities to work and live in the same area, the cumulative impact would remain significant.</i></p> <p><i>The proposed Project is intended to be consistent with the NBC Development Agreement and conform to the Downtown Community Plan. The project boundaries are the same and all the components of the original project have been carried forward that were identified in the 1992 Final EIR/EIS and Development Agreement. The mitigation measure included in the Final EIR/EIS and Downtown Community Plan EIR will apply to the Project and reduce Project-related impacts to less than significant levels. Consistent with the findings of the Final EIR/EIS, cumulative impacts will, however, remain significant and unavoidable.</i></p>						
4. BIOLOGICAL RESOURCES						
(a) Substantially effect, either directly or through habitat modifications, any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by local, state or federal agencies?					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>Due to the highly urbanized nature of the downtown area, there are no sensitive plant or animal species, habitats, or wildlife migration corridors within the area. In addition, the ornamental trees and landscaping located in the downtown area are considered of insignificant value to native wildlife in their proposed location. In February 2007, the Department of Fish and Game confirmed that development of the NBC Project has no potential effect on fish, wildlife and habitat. (Department of Fish and Game (Feb. 5, 2007) CEQA Filing Fee No Effect Determination Form.)</i></p> <p><i>Therefore, no impact to any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by local, state or federal agencies is anticipated to occur as a result of implementation of the Project.</i></p>						
<p>(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations by local, state or federal agencies?</p> <p><i>The Downtown Planning area is not within a subregion of the San Diego County Multiple Species Conservation Program (MSCP), and does not contain any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations by local, state, or federal agencies. Therefore, impacts to riparian habitat or other sensitive natural communities would not occur as a result of</i></p>					X	X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>the proposed amendments.</i>						
5. CULTURAL RESOURCES						
<p>(a) Substantially impact a significant historical resource, as defined in CEQA Guidelines section 15064.5?</p> <p><i>The Final EIR/EIS analyzed impacts to Buildings 1, 11, and 12 which appear to qualify as historic buildings on the NBC Project site. Impacts to Buildings 1 and 12 would result from their removal or substantial renovation; however, Building 11 is beyond the Project limits and would not be affected by the Project.</i></p> <p><i>The Final EIR/EIS identifies removal or substantial alteration of Buildings 1 and 12 as a significant adverse effect of the Project. The Final EIR/EIS includes mitigation measures which require consultation with the California SHPO and Advisory Council on Historic Preservation. Proposed mitigation includes a program for recording Buildings 1 and 12 pursuant to Section 110(b) of the National Historic Preservation Act. (Final EIR/EIS, pp. 4-210 to 4-211.)</i></p> <p><i>The Final EIR/EIS indicates that the consideration of cumulative impacts was not an issue for the Project because the resources are site specific and no historic districts have been identified in the area that would be affected through the loss of resources</i></p>			X			X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>within the Project. (Final EIR/EIS, p.4-211.)</i></p> <p><i>The proposed Project is consistent with the NBC Development Agreement and conforms to the policies of the Downtown Community Plan. The Project boundaries remain the same and all the components of the original project have been carried forward that were identified in the 1992 Final EIR/EIS and Development Agreement. The mitigation measure included in the Final EIR/EIS and Downtown Community Plan EIR will apply to the Project and reduce Project-related impacts to less than significant levels.</i></p>						
<p>(b) Substantially impact a significant archaeological resource pursuant to § 15064.5, including the disturbance of human remains interred outside of formal cemeteries?</p> <p><i>The Final EIR/EIS analyzed impacts to subsurface archaeological deposits and indicates that the alternatives requiring deep excavations for footings and below-grade construction would most likely destroy any resources. The Final EIR/EIS concludes, however, that this impact is not considered significant because the archaeology is not likely to yield any important information about the history or prehistory of the area. (Final EIR/EIS, pp. 4-209 to 4-210.)</i></p> <p><i>The Final EIR/EIS indicates that the consideration of cumulative impacts to cultural resources was not an issue for the Project. (Final EIR/EIS, p. 4-211.)</i></p>					X	X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>The proposed Project is consistent with the NBC Development Agreement and conforms to the policies of the Downtown Community Plan. The Project boundaries remain the same and all the components of the original project have been carried forward that were identified in the 1992 Final EIR/EIS and Development Agreement. Impacts to archeological resources remain less than significant.</i>						
(c) Substantially impact a unique paleontological resource or site or unique geologic feature? <i>The proposed Project does not include changes with a potential to adversely affect paleontological resources; impacts are not significant.</i>					X	X
6. GEOLOGY AND SOILS						
(a) Substantial health and safety risk associated with seismic or geologic hazards? <i>The Final EIR/EIS for the NBC Project analyzed impacts associated with geology and soils and concluded that with mitigation measures, including compliance with building codes, impacts from geologic hazards would be less than significant.</i> <i>While several changes have occurred with respect to information known about geologic</i>			X	X		

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>conditions since 1990, these changes were addressed in the 2006 Downtown Community Plan EIR. The Downtown Community Plan EIR recognizes that the Downtown Planning area is located in a seismically active region and that the Rose canyon fault zone, Downtown Graben, and the San Diego Fault traverse the Downtown Planning area. According to the Downtown Community Plan EIR, a seismic event on these faults could cause significant seismic groundshaking within the downtown area. Therefore, the proposed Project would allow development in an area with potential for substantial health and safety risks associated with a seismic hazard. Although the potential for geologic hazards (landslides, liquefaction, slope failure, and seismically-induced settlement) is considered low due to the moderate to non-expansive geologic structure that underlies the planning area, such hazards could nevertheless, occur. The Community Plan EIR indicates that conformance with, and implementation of, all seismic-safety development requirements, including City requirements for the Downtown Special Fault Zone, the seismic design requirements of the Uniform Building Code (UBC), the City of San Diego Notification of Geologic Hazard procedures, and all other applicable requirements would ensure that the potential impacts associated with seismic and geologic hazards in the Downtown Community Plan area are not significant.</p> <p>The proposed Project is consistent with the NBC Development Agreement and conforms to the policies of the Downtown Community Plan. The Project boundaries remain the</p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>same and all the components of the original project have been carried forward that were identified in the 1992 Final EIR/EIS and Development Agreement. The mitigation measures included in the Final EIR/EIS and Downtown Community Plan EIR will apply to the Project and reduce Project-related impacts to less than significant levels.</i>						
7. HAZARDS AND HAZARDOUS MATERIALS						
<p>(a) Substantial health and safety risk related to onsite hazardous materials?</p> <p><i>The Final EIR/EIS analyzes health hazards associated with the presence of hazardous substances on the Project site and concludes that, with mitigation, any potential impacts will be less than significant. No action-level (i.e., clean-up level) concentrations of hazardous substances were found in investigations conducted on the project site, though the Final EIR/EIS recognizes that no study is thorough enough to preclude the detection of all substances that might be present on the site. Several areas of contamination or potential contamination were identified on the site that could adversely affect the health of personnel on the site, especially during construction activities that uncover soils.</i></p> <p><i>The area beneath the surrounding Building 8 may contain hazardous substances. If these materials exist and are exposed, they could cause significant health impacts. If the integrity of any units that store PCB-laden oil is compromised, contamination with this material could occur, also a significant health concern. Acid levels in soils near</i></p>			X			X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>Building 106 could cause metals in the soils to become more mobile and the oily surface residue in the vicinity of Buildings 7 and 106 may contain residues of concern with regard to health. The Final EIR/EIS took the conservative position that these conditions would be considered a significant adverse effect.</i></p> <p><i>Through consultation with the EPA, mitigation measures were included in the Final EIR/EIS to reduce these impacts to a less than significant level.</i></p> <p><i>The proposed Project is consistent with the NBC Development Agreement. The Project boundaries remain the same and all the components of the original Project have been carried forward that were identified in the 1992 Final EIR/EIS and Development Agreement. The mitigation measures included in the Final EIR/EIS will apply to the Project and reduce Project-related impacts to less than significant levels.</i></p>						
<p>(b) Be located on or within 2,000 feet of a site that is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5?</p> <p><i>The Project site is not located within 2,000 feet of a site that is included on a list of hazardous materials sites compiled pursuant to Government Code, § 65962.5.</i></p> <p><i>According to the Downtown Community Plan Final EIR, the Downtown Planning Area</i></p>					X	X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information <i>contains one site, the Tow Basin Facility, on the State of California Hazardous Waste and Substances Sites List. This site is located well over 2,000 feet from the Project site. In any event, the Downtown Community Plan Final EIR concludes that compliance with mandatory federal, state, and local regulations will ensure that significant hazards to the public and the environment will not occur.</i> <i>The proposed Project is consistent with the NBC Development Agreement and conforms to the policies of the Downtown Community Plan. The Project boundaries remain the same and all the components of the original Project have been carried forward that were identified in the 1992 Final EIR/EIS and Development Agreement.</i>						
(c) Substantial safety risk to operations at San Diego International Airport? <i>The Final EIR/EIS states that the Project includes building heights that approach the imaginary surfaces associated with Lindbergh Field and NAS, North Island designed to protect navigable airspace; however, the site is not within any safety hazard zones as defined by the AICUZ for NAS, North Island and is not within any clear zones or other high safety hazard zones associated with Lindbergh Field. Neither the horizontal surface from Lindbergh Field nor the conical surface from NAS, North Island, are surfaces that affect the operations of either airfield, and exceedance of these surfaces means only that notification to the FAA is required. The Navy notified the FAA of the</i>					X	X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>proposed Project and, in response, the FAA prepared a Determination of No Hazard to Air Navigation and has indicated the Project would not have a significant effect on the safe and efficient utilization of navigable airspace.</i>						
<i>The proposed Project is consistent with the NBC Development Agreement. The Project boundaries remain the same and all the components of the original project have been carried forward that were identified in the 1992 Final EIR/EIS and Development Agreement. All buildings comply with the height limits specified in the Development Agreement. The conclusions of the Final EIR/EIS with respect to airport hazards therefore continue to apply to the Project that the impacts are less than significant.</i>						
(d) Substantially impair implementation of an adopted Emergency response plan or emergency evacuation plan? <i>The proposed Project does not propose any features that would affect an emergency response or evacuation plan. Therefore, implementation of the proposed Project is not anticipated to result in substantial impairment of an adopted emergency plan or an emergency evacuation plan; impacts are not significant.</i>					X	X
8. HYDROLOGY AND WATER QUALITY						
(a) Substantially degrade groundwater or surface water quality?					X	X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>The Final EIR/EIS concluded that because the existing water facilities in the project vicinity were currently operating well within their service capacity, there would be no significant impacts to water service from implementation of the Development Agreement. Implementation of the proposed Project would not substantially degrade groundwater or surface water quality. This impact remains less-than-significant. Since the Final EIR/EIS was certified, the San Diego Regional Water Quality Control Board has determined that the San Diego Bay is an impaired water body. In addition, there have been changes in State law and local regulations since that time. For the reasons that follow, however, water related impacts will remain less-than-significant.</i></p> <p><i>Final project plans for the Project must include the design of storm drainage structures consistent with Phase II NPDES Permit regulations. Under the Phase II General Permit regulations governing small Municipal Separate Storm Sewer Systems (MS4s), the Developer is required to develop and implement a SWMP designed to reduce discharge through MS4s to the highest extent practicable, and the SWMP will be fully implemented by the end of the permit term.</i></p> <p><u>Surface Water Resources</u></p> <p><i>A comprehensive Water Quality Technical Report (WQTR) will be prepared by the</i></p>						

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>Developer in accordance with the City's Standard Urban Stormwater Mitigation Plan (SUSMP). Provisions of the WQTR will focus on the protection of water resources from project-generated adverse impacts to surface runoff of the maximum extent practicable, identifying both construction and programmatic Best Management Practices (BMPs) as required. The WQTR will be commensurate with the level of effort required based on completion of the SUSMP Applicability Checklist. The WQTR will follow the required format as set forth in the City's Land Development Manual Storm Water Standards, including, but not limited to identification of the potential impacts (flows and pollutants), proper design of post construction BMPs based on standard design criteria presented in the SUSMP, implementation of construction and post-construction BMPs, and a maintenance agreement for the operation and maintenance of post-construction BMPs.</i></p> <p><i>Prior to issuance of a grading permit for any phase or unit of development within the proposed Project, the Developer will submit a Notice of Intent for construction in compliance with the NPDES Construction General Permit. As part of the application process, a project-specific SWPPP must be developed and implemented on site. (2006 EA, pp. 3.7-10 to 3.7-12.)</i></p> <p><u>Groundwater Resources</u></p>						

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>Implementation of the proposed Project would require temporary dewatering during construction activities. Therefore, the Developer is required to enroll under RWQCB Order No. 2000-090. Enrollment under this Order will be required for any discharge of groundwater extracted and discharged into the San Diego Bay during construction activities, and effluent limitations will be subject to the terms and conditions of this Order. Under Order No. 2000-090, the Developer will be allowed only temporary dewatering during construction activity; no permanent groundwater extraction during project operations will be permitted.</i></p> <p><i>If infiltration into subterranean structures cannot be prevented through design and construction features, then extracted groundwater from permanent operations may be discharged into the City's sanitary sewer system. This option would require a permit from the City under SDMC 64.0500, Industrial Wastewater disposal.</i></p> <p><i>Implementation of these permit conditions would ensure compliance with the regulatory requirements set forth by federal, state, and local agencies. Compliance with the specified measures would reduce hydrology and water quality impacts from construction activities and operational impacts, including nonpoint and point-source discharges, to below a level of significance. (2006 EA, pp. 3.7-12 to 3.7-13.)</i></p>						
(b) Substantially increase impervious surfaces and associate runoff flow rates or					X	X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>volumes?</p> <p><i>The NBC site is essentially level, at street grade, and already covered with impervious surfaces. During storm events, surface water drainage flows to an existing network of subsurface storm drains located on and adjacent to the project site that discharge to the San Diego Bay. The proposed Project would require building demolition, subsurface excavations for building foundations and subterranean parking, and reconstruction of onsite storm drains. Implementation of the proposed Project could adversely affect hydrology and water quality conditions on the site and in the Project vicinity.</i></p> <p><i>However, because the Developer must comply with existing federal, state and local regulations, the proposed Project would not result in any significant water quality impacts.</i></p>						
9. LAND USE AND PLANNING						
<p>(a) Physically divide an established community?</p> <p><i>The Final EIR/EIS concluded that the NBC Project would be compatible with existing and planned surrounding land uses, and would not create any significant environmental effects associated with land use compatibility. (Final EIR/EIS, p. 4-12.)</i></p> <p><i>Implementation of the proposed Project would not divide an established community.</i></p>					X	X

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Issues and Supporting Information	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
<p>Issues and Supporting Information</p> <p><i>Much of the recent development in the neighborhoods surrounding the NBC has included high-rise structures with multi-family residential units, such as Electra and Grande at Santa Fe Place. The Little Italy neighborhood north of the site has been targeted for the majority of residential growth in the project vicinity, with nearly 5,000 units planned. The proposed action would contribute to a needed supply of commercial and retail uses that would support the surrounding residential development and waterfront uses. Therefore, consistent with the findings of the Final EIR/EIS and the Downtown Community Plan Final EIR, the proposed Project would not physically divide an existing community.</i></p> <p>(b) Substantially conflict with the City's General Plan and Progress Guide, Downtown Community Plan or other applicable land use plan, policy, or regulation?</p> <p><i>The Final EIR/EIS concluded that the NBC Project would be compatible with existing and planned surrounding land uses, and would not create any significant environmental effects associated with land use compatibility. (Final EIR/EIS, p. 4-12.)</i></p> <p><i>New planning documents that cover the NBC site have been adopted since the execution of the Development Agreement. The plans include the North Embarcadero Area Vision Plan (NEAVP) and the San Diego Downtown Community Plan. Both plans have assumed the NBC would be redeveloped by the Navy and its development partner as</i></p>					X	X

<p>Not Significant (NS)</p> <p>Significant But Mitigated (SM)</p> <p>Significant And Not Mitigated (SNM)</p>	Issues and Supporting Information		<p>defined in the Development Agreement.</p> <p>Implementation of the proposed Project would contribute 1,647,513 sf of new administrative office space to the Centre City region, which is well within the Downtown Community Plan estimates. The Downtown Community Plan identifies the Navy Broadway Complex as supporting waterfront and marine uses, including major tourist and local visitor attractions, trade, office, eating and drinking establishments, retail, parking, museum and cultural facilities, and hotels. The proposed Project would incorporate many of these uses on the site, including office, retail, parking, museums, and hotels, and would be compatible with adjacent land uses.</p> <p>The Downtown Community Plan's vision for the Columbia neighborhood, which includes a substantial portion of the NBC site, states that the NBC has significant development potential and that reuse of the site would offer the neighborhood a reinvigorated, connected waterfront. With the exception of Seaport Village, OPH, and the NBC, the Marina neighborhood is not expected to accommodate significant growth. Implementation of the proposed Project would complement the planning focus of completing the Marina neighborhood with needed retail, open space, as well as improved access to the San Diego Bay.</p> <p>Implementation of the Project would likewise be consistent with and enhance goals</p>
	Direct (D)		
	Cumulative (C)		
	Direct (D)		
	Cumulative (C)		

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>identified in the NEAVP. Implementation of the Project would provide accessible bayfront, and public parks, as well as physical extension to the Bay.</i></p> <p><i>For these reasons, implementation of the proposed Project would not conflict with the City's General Plan and Progress Guide, Downtown Community Plan or other applicable land use plan, policy, or regulation. As such, this impact is less-than-significant.</i></p>						
<p>(c) Be substantially incompatible with surrounding land uses?</p> <p><i>The Final EIR/EIS concluded that the NBC Project would be compatible with existing and planned surrounding land uses, and would not create any significant environmental effects associated with land use compatibility. (Final EIR/EIS, p. 4-12.)</i></p> <p><i>The proposed Project is consistent with the NBC Development Agreement. The Project boundaries remain the same and all the components of the original project that were identified in the 1992 Final EIR/EIS and Development Agreement have been carried forward.</i></p> <p><i>Implementation of the Project would be compatible with surrounding land uses. The NBC is located in the Columbia and Marina neighborhoods of downtown San Diego,</i></p>					X	X

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>which have experienced substantial development since the execution of the Development Agreement. Implementation of the proposed Project would develop a mixed-use project including office, retail, hotel, public open space, new landscaping, upgraded public facilities, and new roadway improvements that would compliment adjacent uses in the surrounding areas.</i>						
10. MINERAL RESOURCES						
<p>(a) Substantially reduce the availability of important mineral resources?</p> <p><i>The Final EIR/EIS analyzed impacts to mineral resources and, based on information available from the U.S. Bureau of Land Management and the California Division of Oil and Gas, concluded that the Project site is not known to contain any extractable resources. As the Project site is not known to have any extractable resources such as oil, gas, or aggregate, and no resources are known to have been extracted from the site, no significant impacts will result. (Final EIR/EIS, pp. 147-148.)</i></p> <p><i>The proposed Project is intended to be consistent with the NBC Development Agreement and conform to the policies of the Downtown Community Plan. The Project boundaries remain the same and all the components of the original project have been carried forward that were identified in the 1992 Final EIR/EIS and Development Agreement. The Project will not result in any significant impacts to mineral resources.</i></p>					X	X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
11. NOISE						
(a) Substantial noise generation?			X	X		
<u>Short-Term Noise Impacts</u> <p>The Final EIR/EIS states that implementation of the Development Agreement could cause a short-term annoyance to noise-sensitive land uses in the surrounding area due to construction activities. (Final EIR/EIS, p. 4-181). According to the Final EIR/EIS, this impact would be mitigated to a less-than-significant level through compliance with the San Diego County Code, which requires that significant noise generating construction activities will be limited to Monday through Saturday, 7:00 a.m. to 7:00 p.m. (Final EIR/EIS, p. 4-186.)</p> <p>The City of San Diego noise ordinance, noise effects from construction activities on residential receptors are not to exceed 75 dBA, averaged over a 12-hour period. According to the 2006 NBC EA, the loudest construction noise associated with the Development Agreement would be from demolition of existing structures, concrete foundations, and parking areas. The nearest sensitive receptors to a demolition site are residents at Archstone Harborview, approximately 150 feet away. At this distance, the maximum noise level from demolition activities is calculated at 82 dBA and the average</p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>hourly noise level would be 77 dBA L_{eq} (EA 2006, p. 3.9-8.) Assuming a worst-case scenario of 8 hours of noise at 77 dBA level from demolition, the average noise level over 12 hours would be 75 dBA, which equals but does not exceed the limits of the City Noise Ordinance.</p> <p>Implementation of the proposed Project implements and is consistent with the Development Agreement. Nothing about the proposed Plan indicates that it would generate additional noise beyond that contemplated by the Development Agreement. Accordingly, short term noise impacts would remain less than significant.</p> <p><u>Long-Term Noise Impacts</u></p> <p>The NBC would include mechanical equipment that would generate noise that could be heard at receptors offsite. Equipment could include heating fans, ventilating, air conditioning, cooking, and laundry equipment and emergency generators. The City of San Diego noise ordinance limits the noise from these sources to 65 dBA L_{eq} from 7:00 a.m. to 7:00 p.m. and 60 dBA L_{eq} from 7:00 p.m. to 7:00 a.m. The Project does not include specific building designs that specify the types and locations of equipment, nor are such plans required at this stage of the planning process. At the time the Developer submits to the City Building Inspection Department approval plans showing the locations of noise-generating equipment, the Developer will be required to demonstrate</p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information <i>that the buildings will comply with the City noise ordinance. Compliance with the City's noise ordinance will ensure that noise generated from implementation of the proposed Project remains less-than-significant.</i> <u>Noise Generated Away From Project Site</u> <i>Following construction completion, noise would be generated offsite by vehicle traffic utilizing the proposed development. Traffic generated by the NBC Project as well as for other anticipated development in the area is included in the SANDAG 2030 forecasted volumes. Using these cumulative volumes, traffic noise was assessed for major roadways in the Project area. Observed speeds and vehicle mix from the August 2005 noise measurements were used in the model. The results showed that the noise increases from the existing condition to the 2030 condition, which includes traffic generated by the NBC Project as detailed in the Development Agreement, would be less than 3 dBA. (2006 EA, p. 3.9-10.) There is nothing about the proposed Project that suggests it would result in more noise than indicated in the Development Agreement.</i> <i>Thus, both the cumulative and direct noise impacts would be less than significant.</i>						
(b) Substantial interior noise within habitable rooms (e.g. levels in excess of 45 dB (A) CNEL)?			X			X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>The Final EIR/EIS states that, as in any downtown urban area characterized by dense development, future traffic noise levels are expected to be relatively high in the vicinity of the NBC. The hotels proposed in the Development Agreement and in the Project would be within the 65 dB CNEL contour of Pacific Highway. As stated in the Final EIR/EIS, this could result in noise levels in excess of 45 dB CNEL in hotel rooms, which would be a significant impact. (Final EIR/EIS, p. 4-181.)</i></p> <p><i>As required by Mitigation Measure 4.9-3 of the Final EIR/EIS, prior to the issuance of building permits for hotel structures under the proposed Project, building specifications for hotel structures describing the acoustical design features of the structures and evidence must be prepared by an acoustical consultant that sound attenuation measures will satisfy the interior noise standard of 45 dB CNEL must be submitted to the City Building Inspection Department for approval. Implementation of this measure will ensure that interior noise impacts remain less than significant.</i></p>						
12. POPULATION AND HOUSING						
<p>(a) Substantially induce population growth in an area?</p> <p><i>The 2006 Downtown Community Plan EIR analyzed implementation of the Downtown Community Plan on population and housing. According to the Downtown Community</i></p>					X	X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>Plan Final EIR, CCDC projected a maximum population of 89,100 by the year 2030 under the Community Plan. Therefore, the existing population of 27,500 would more than quadruple as a result of the Downtown Community Plan.</i></p> <p><i>The Downtown Community Plan Final EIR concluded that the number of residential units under the Community Plan would reach a maximum of 53,100 by the year 2030, which means that the existing number of residential units would increase by approximately 360 percent. This year 2030 residential unit projection for the Community Plan is greater than that anticipated by the 2030 City/County Forecast. SANDAG's projected number of residential units in the downtown planning area is 34,284 by 2030. The difference between CCDC's estimate based on the Community Plan and the SANDAG forecast is 18,818 residential units. Therefore, the Community Plan EIR concluded that it would contribute additional housing to a region that is currently experiencing housing deficiencies and would have a beneficial effect on housing supply.</i></p> <p><i>In addition, according to the Final EIR/EIS employment growth associated with implementation of the Development Agreement could result in indirect housing demands and population growth through project-induced in-migration to the region. Given the substantial housing and population base in San Diego, however, the Final EIR/EIS concluded that new employees to the region associated with the NBC Project would be</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>absorbed without notable secondary effects. Because San Diego has grown to an even larger population base than the population in 1992 and because the proposed Project would not result in greater employment opportunities than the Development Agreement allows, impacts to population growth remain less than significant.</i>						
<p>(b) Substantial displacement of existing housing units or people?</p> <p><i>Housing units are not currently located on the NBC site nor do people reside on the site. Nor would the Project result in off-site housing or people to be displaced. Therefore, implementation of the proposed Project could not result in a substantial displacement of existing housing units or people.</i></p>					X	X
13. PUBLIC SERVICES AND UTILITIES						
<p>(a) Substantial adverse physical impacts associated with the provision of new schools?</p> <p><i>The NBC is located within the San Diego Unified School District. (SDUSD). According to the Final EIR/EIS, implementation of the Development Agreement would not directly contribute students to the elementary and secondary schools within the San Diego Unified School District because residential uses are not included within the Agreement.</i></p> <p><i>According to the 2006 Environmental Assessment prepared to consider implementation</i></p>					X	X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>of the Development Agreement, SDUSD enrollment has been declining since the 2000-2001 school year, when the student population reached a peak of 142,260. This was after more than 20 years of steady growth in the 1980s and 1990s. School enrollment within the overall SDUSD system is currently operating below capacity, serving a total student population of 129,580 as of September 2005. Generally, elementary schools are operating well below capacity, while secondary schools are generally operating closer to, but not exceeding, estimated occupancy levels. The SDUSD has forecast a decline in student enrollment through the 2013-2014 school year. Although the downtown region has experienced considerable residential growth in recent years, the increased residential development occurring in the area has thus far not generated a significant public school population. SDUSD staff is closely monitoring this situation and working with city staff to plan for new school facilities downtown should they be needed. (2006 EA, p. 3.4-7.)</i></p> <p><i>In July 1998, San Diego voters approved proposition MM, which allocates \$1.51 billion to fund modernization of the 161 then existing schools, construction of 12 new schools, and the rebuilding of 3 existing schools. The SDUSD utilizes fees under Proposition MM funding. While there are no current plans for construction of new schools that would specifically serve the NBC, Golden Hill Elementary and Laura G. Rodriguez Elementary are located near downtown San Diego. Golden Hill Elementary opened in January 2006 and Laura G. Rodriguez Elementary is expected to open September 2007.</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase 1 Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>Proposition MM has resulted in the improvements of school facilities, as well as the addition of six new elementary and two new middle schools.</i></p> <p><i>Education Code Section 17620 (formerly known as Government Code Section 35080) authorizes school districts to levy a fee, charge, dedication, or other form of requirement against any development project for the construction or reconstruction of school facilities. The SDUSD prepared the District's Impact Fee Justification Study, dated January 2003, which concluded that it is necessary to implement the authority of Section 1782- to levy fees in the amount of:</i></p> <ul style="list-style-type: none"> <i>\$2.14 per foot for construction of new residential buildings; and</i> <i>\$0.36 per square foot for commercial and industrial construction.</i> <p><i>The developer will pay the required impact fees of \$0.36 per square foot for the construction of new office, commercial, and hotel development in accordance with the MMP except for the Navy Office Building per the Development Agreement. Accordingly, there would not be significant impacts to schools associated with implementation of the proposed Project.</i></p>						
(b) Substantial adverse physical impacts associated with the provision of fire protection/emergency services?					X	X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>The Final EIR/EIS concludes that existing fire protection/emergency facilities, manpower and equipment at the city and Federal fire departments are adequate to maintain a sufficient level of fire protection service to project site under the Development Agreement. The Final EIR/EIS therefore concluded that the impacts to fire protection associated with implementation of the Development Agreement are less-than-significant. (Final EIR/EIS, pp. 4-115 – 4-117.)</i></p> <p><i>The Final EIR/EIS explains that implementation of the Development Agreement would increase vehicular traffic on surrounding streets and arterials, which may increase the risk of traffic accidents. According to the Final EIR/EIS, however, implementation of the circulation improvements proposed to mitigate impacts from the NBC redevelopment and other area development, as discussed in Section 4.2.3, page 4-65 of the Final EIR/EIS would reduce this potential adverse effect to a level of less than significant.</i></p> <p><i>According to the Downtown Community Plan Final EIR, the San Diego Fire Department is in the process of securing sites for two new fire stations in the downtown area. As stated in the Community Plan Final EIR, while the two new fire stations, which may be built downtown, would result in physical impacts, their construction would not be directly related to the Community Plan. Furthermore, insufficient information exists to accurately determine the physical impacts which may occur from either of the proposed stations. As no site has been selected for a station west of Harbor Drive, no</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>evaluation can be made.</i></p> <p><i>As with the Development Agreement, development under the proposed Project would result in construction of new buildings and underground parking facilities that would be susceptible to fire hazards or would require emergency medical response. Pursuant to the Development Agreement, proposed development of the NBC will include sprinklers and other fire safety measures that would reduce fire impacts. Water flows of 9,463 liters per minute (2,500 gallons per minute) would be required with a sprinkler fire system to adequately serve the NBC site. (2006 EA, p. 3.4-5).</i></p> <p><i>According to the 2006 Environmental Assessment prepared for the Development Agreement, existing facilities, staffing, and equipment remain adequate to maintain a sufficient level of fire protection service to the project site. In addition, in response to the growth projections for the region not associated with the NBC Project, the San Diego Fire Department has secured a site for a new fire station, known as the Bayside Station, at the southeast corner of Cedar and Pacific Highway. The Federal Fire Station at 32nd Street would also continue to provide as-needed service to the site.</i></p> <p><i>In addition, as described by the Downtown Community Plan Final EIR, Policy 8.2-P-1 of the Downtown Community Plan calls for the collection of Development Impact Fees (DIF) for all development to help pay for needed fire facilities. The Project</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information <i>Developers will pay this fee in relation to development of the NBC, except for the Navy office building, per the Development Agreement.</i> <i>For these reasons, the proposed Project would not require additional fire or emergency protection beyond that analyzed in the 1992 Final EIR/EIS, the 2006 Downtown Community Plan Final EIR, or in the 2006 EA. Therefore, no significant impacts to fire protection/emergency services are anticipated with implementation of the proposed Project.</i>						
(c) Substantial adverse physical impacts associated with the provision of law enforcement services? <i>According to the 2006 EA, the potential law protection impacts remain the same as those identified by the Final EIR/EIS (i.e. an increased risk of traffic accidents due to increased vehicular traffic on surrounding streets and arterials and a potential for increased car prowls on parked vehicles as a result of the higher density use proposed by the project.) Like the Final EIR/EIS, the 2006 EA concluded that these impacts will be less than significant. As explained in the 2006 EA, in response to the future growth and development projected for the region not associated with the NBC project, the San Diego Police Department has recommended an increase in staff of 38 officers</i>					X	X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>downtown over the next 5 years, and a related increase in civilian staff. Any additional staff would be available to assist the site. In addition, Harbor Police would continue to serve the San Diego Bay waterfront, including the project site, in coordination with the San Diego Police Department. Navy Shore Patrol and Commander Navy Region Southwest Public Safety would also continue to provide safety responses to Navy-occupied buildings in support of the City and Harbor Police. (2006 EA, p. 3.4-3.)</i></p> <p><i>Implementation of the proposed Project would not affect the provision of law enforcement to serve the project area because the proposed uses and intensities are virtually identical to those outlined by the Development Agreement. Therefore, implementation of the proposed Project would not result in significant impacts to police services.</i></p>						
<p>(d) Substantial adverse physical impacts associated with the provision of water transmission or treatment facilities?</p> <p><i>The Final EIR/EIS concluded that because existing water facilities in the project vicinity are currently operating well within their service capacity, there would be no significant impacts to water service from implementation of the Development Agreement.</i></p> <p><i>According to the 2006 EA, implementation of the Development Agreement would</i></p>					X	X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>consume an addition 0.5 percent of current City water consumption rates per day. (2006 EA, p. 3.4-13.) This amount would likely be smaller under the proposed Project because the Project proposes less development than approved in the Development Agreement.</p> <p>San Diego Municipal Code 147.04 requires that all buildings, prior to a change in property ownership, be certified as having water-conserving plumbing fixtures in place. Though ownership of the property remains with the Navy, water-using elements of the proposed Project will comply with this ordinance. In addition, once detailed plans for the site under the Project have been approved, the developer will work with the City to determine detailed flow rates for the site.</p> <p>Water supply has been accounted for by the San Diego County Water Authority (SDCWA) in its 2000 Urban Water Management Plan (UWMP) (SDCWA). The UWMP uses a modeling program to assess future water demand and utilizes demographic data and regional growth forecasts from SANDAG to calculate projected water demand. Based on this information, there is expected to be sufficient supply to meet the demands of the project because development is accounted for in certified development plans and environmental documents.</p> <p>Finally, the existing water facilities in the project vicinity are currently operating within</p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>their service capacity. Compliance with San Diego Municipal Code 147.04 would reduce the amount of water consumed by build-out of the proposed Project. In addition, ongoing upgrades to the Alvarado Water Treatment Plan have increased its capacity of treated water by 33 percent.</i></p> <p><i>Therefore, consistent with the conclusions of the Final EIR/EIS, no significant impacts to water service or water infrastructure are anticipated from the proposed Project.</i></p>						
<p>(e) Substantial adverse physical impacts associated with the provision of wastewater transmission or treatment facilities?</p> <p><i>According to the Final EIR/EIS, the NBC Project would significantly increase the amount of wastewater conveyed through existing sewer facilities. This would represent a substantial increase over existing uses and would result in significant impacts to sewer conveyance facilities. Mitigation Measure 4.4.6, requires the existing 15-inch diameter mains located in Pacific Highway and in Market Street to be upgraded by the developer, in coordination with the City of San Diego, to a capacity sufficient to serve future onsite development, as well as future upstream and tributary developments that would be linked to them. The Final EIR/EIS concludes that implementation of Mitigation Measure 4.4.6 would avoid impacts related to sewer facilities, and as such this impact is less than significant. (Final EIR/EIS, p. 4-126.) Pursuant to Mitigation</i></p>			X	X		

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>Measure 4.4.6, the developer of the proposed Project will work with the City to upgrade the existing 15-inch diameter mains located in Pacific Highway and in Market Street. Given this measure, significant impacts of the Superseding Master Plan related to sewer facilities will be avoided.</i></p> <p><i>According to the 2006 EA, implementation of the Development Agreement would increase flows at Point Loma Water Treatment plant (PLWTP) by less than .2 percent. The proposed Project would likely increase flows to even less than that projected for the Development Agreement because the amount of square footage dedicated to Navy and/or private use is less than what was originally approved. Given that PLWTP Since 1992 when the Final EIR/EIS was certified, there has not been an increase in the amount of effluent and PLWTP is operating at 73 percent of design capacity, additional plant improvements would not be required to accommodate these additional flows.</i></p> <p><i>Prior to execution of the Development Agreement, both the City and the RWQCB stated that the additional wastewater generated by implementation of the Development Agreement would not significantly affect the quality of water discharged from the outfall, nor would it affect the City's ability to provide secondary treatment of wastewater, nor would it significantly affect the capacity of the wastewater treatment system. (2007 EA, p. 3.4-16.) Since that time, there has been an increase in the amount of effluent discharge and PLWTP has increased its capacity to meet that demand and</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>has a remaining capacity of 27 percent.</i>						
<i>For the reasons provided above, impacts to wastewater treatment associated with implementation of the proposed Project would remain less-than-significant.</i>						
<p>(f) Substantial adverse physical impacts associated with the provision of landfill facilities?</p> <p><i>According to the Final EIR/EIS, based on the City's plans to develop new landfills or expand existing ones to serve the city's future disposal requirements, no significant impacts to solid waste disposal would result from the Development Agreement. (Final EIR/EIS, p. 4-128.)</i></p> <p><i>In addition, to reduce the amount of waste material entering landfills, as well as to meet the recycling goals established by the City and mandated by California AB 939 (1989) the City requires individual redevelopment activities of at least 50 residential units or 40,000 sf of commercial space to submit a Waste Management Plan to limit construction and demolition waste. Pursuant to this requirement, construction demolition debris will be sent to the newly opened construction demolition inert recycling facility, approximately 9 miles from the NBC, to reduce landfill waste associated with demolition of the existing structures.</i></p>					X	X

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	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>Redevelopment activities meeting the 50 residential unit threshold would also be required by San Diego Municipal Code to manage long-term solid waste generated after construction. Development under the proposed Project will be required to have as many recycling bins as trash bins on the premises and provide adequate interior and exterior refuse and recycling storage space. (EA 2006, p. 3.4-19.) Conformance with the Municipal Code would reduce long-term solid waste generation rates, and the County's two future landfill expansion plans will expand the long-term capacity available for solid waste and disposal.</i></p> <p><i>Accordingly, for the reasons provided above, solid waste impacts associated with the proposed Project would be less than significant.</i></p>						
14. PARKS AND RECREATIONAL FACILITIES						
<p>(a) Substantial increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</p> <p><i>The adopted Recreation Element of the City's Progress Guide and General Plan sets forth a series of goals and guidelines for the provision of recreation opportunities in both existing and new communities. "Population-based facilities ideally constitute 1.0 to 3.9 acres of land per 1000 residents depending on proximity to schools and the</i></p>					X	X

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>residential densities of their service areas. Resource-based parks should provide between 15 and 17 acres/1000. Open space lands, sports fields, plazas, and landscaped areas should constitute approximately 1.1 to 2.0 acres/1000 residents. These figures are norms or abstract concepts, however, and should not be rigidly applied throughout the City." (San Diego Progress Guide and General Plan, p. 165.)</i>						
<i>The proposed Project includes 1.9 acres of formal open space/park area at the corner of Broadway and Harbor Drive. These spaces are expected to adequately serve the demand for parks that the Project may generate. The use of these 1.9 acres is expected to off-set any demand for already existing parks. As such, implementation of the proposed Project would not result in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.</i>						
15. TRANSPORTATION/TRAFFIC						
(a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street and highway system (e.g., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			X	X		

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>The Final EIR/EIS concluded that there are no roadway segments or intersections where unavoidable adverse impacts would occur after implementation of the mitigation measures provided in section 4.2 of the EIR/EIS. (Final EIR/EIS, pp. 4-70, 4-73.)</i></p> <p><i>Because traffic conditions have changed since the Final EIR/EIS was certified, the 2006 EA prepared for the NBC Project examined existing conditions and compared those conditions to buildout of the NBC Project as set forth in the Development Agreement. Because the Project implements the Development Agreement, the EA's analysis is relevant to and relied upon by this Initial Study. The following summarizes the traffic analysis performed by the 2006 EA.</i></p> <p><i>LOS information for streets adjacent to the NBC site is included in the Downtown Community Plan EIR Transportation, Circulation and Access Study. Existing LOS within the study area includes all intersections expected to be affected by the redevelopment of the NBC. (See 2006 EA, p. 3.2-2) All studied intersections, except for Grape Street and North Harbor Drive in the p.m. peak hour operate at LOS C or better. The intersection of Grape Street and North Harbor Drive operates at LOS E during the p.m. peak hour. Table 3.2-2 of the 2006 EA summarizes the existing LOS for roadway segments adjacent to the NBC. All roadway segments operate at LOS D or better.</i></p> <p><i>The 2006 EA analyzes trip generation rates associated with land uses assumed in the</i></p>						

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	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>Development. Using trip generation rates from the 1990 City of San Diego Trip Generation Manual, the land uses assumed in the Development Agreement would generate 39,731 ADTs on the downtown circulation network. Based on the conclusions regarding potential traffic impacts presented in the 1991 ROD, the Development Agreement identified specific transportation improvements that will be incorporated into the proposed Project, as discussed below.</i></p> <p><i>The recent traffic analysis completed for the Downtown Community Plan EIR also addressed the potential traffic impacts that would result from implementation of the proposed action and other cumulative projects in the downtown area. The Community Plan EIR utilized the current City of San Diego trip generation rates for downtown San Diego; these rates for individual land uses are lower than the rest of the city because of the high use of public transit and because the density and proximity of land uses downtown reduces the need for multiple automobile trips.</i></p> <p><i>The 2006 EA concluded that the Development Agreement is estimated to generate approximately 27,130 ADT. This represents a 32 percent reduction (12,601 ADT) from the number of trips assumed in the Development Agreement. This large reduction in ADT is due mainly to the reduced trip generation rates identified by the City that best reflect greater use of public transportation in the downtown area. According to the 2006 EA, the 32 percent reduction in number of trips would lessen the potential traffic</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>impacts that were assumed when the Navy and the City entered into the Development Agreement. The proposed Project is consistent with the Development Agreement and is virtually the same in terms of use and intensity as the Development Agreement.</i></p> <p><i>All of the following transportation improvements in the Development Agreement will be implemented by the City and the developer, as indicated in the MMP during construction of the project as proposed by the Project:</i></p> <ul style="list-style-type: none"> <i>E, F, and G streets shall be extended to allow for continuous vehicular and pedestrian access between Pacific Highway and North Harbor Drive;</i> <i>G Street shall provide enhanced access between the Marina neighborhood and the G Street Mole by extending G Street as a major pedestrian promenade;</i> <i>Pacific Highway shall be widened and improved along the frontage adjacent to the NBC; and</i> <i>A Long-Term Travel Demand Management (TDM) Program shall be implemented.</i> <p><i>The substantial reduction in ADTs calculated in the updated traffic analysis confirms the conclusions of the Development Agreement and the Final EIR/EIS that the agreed-</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>upon traffic improvements would be sufficient to mitigate potential traffic impacts in today's conditions.</i>						
<p>(b) Create an average demand for parking that would exceed the average available supply?</p> <p><i>The Final EIR/EIS concludes that the Development Agreement would accommodate 80 percent of the parking demand, without Travel Demand Management measures (TDMs). The Final EIR/EIS concludes that the successful application of TDM to the Development Agreement would reduce the level of vehicular traffic by increasing transit and ridesharing use as has been documented in San Diego. Accordingly, there would be no reliance on offsite parking to meet the project's demands.</i></p> <p><i>When the Development Agreement was signed in 1992 and the Final EIR/EIS certified, the City had no minimum or maximum parking requirements for development in the Centre City area. Instead, parking supply ratios were based on surveys of other Centre City projects. The Development Agreement utilized the maximum parking rates for the proposed Development Plan as follows:</i></p> <ul style="list-style-type: none"> <i>Navy Administration Space: 1.00 spaces per 1,000 sf plus 0.23 per 1,000 sf for official fleet vehicles;</i> <i>Commercial Office: 1.00 spaces per 1,000 sf</i> 					X	X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<ul style="list-style-type: none"> • Hotel: 0.75 spaces per guest room • Retail: 4.00 spaces per 1,000 sf. <p><i>These requirements are vested in the 1992 Agreement and are not superseded by subsequent zoning regulations adopted within the Centre City Planned District Ordinance (PDO). The Agreement establishes maximum parking ratios for the development based on land uses. The Final EIR/EIS acknowledged that, at the time of the Agreement's approval, there were no minimum or maximum parking requirements in the Centre City area. The Final EIR/EIS, however, evaluated parking demand for the project and concluded that with the availability of transit in the downtown area and the adoption of the Transportation Demand Management Plan (required for each phase of the project), the development would provide an adequate amount of on-site parking and there would be no reliance on off-site parking facilities to meet parking demand.</i></p> <p><i>The Final EIR/EIS identified a need for 3,105 parking spaces. The proposed Project is not deficient in that the 3,105 spaces evaluated in the Final EIR/EIS were based on a different size project. The 3,105 sf of parking identified by the Final EIR/EIS, assumed 3.25 million sf of development in the project area. The parking proposed for hotel uses under the Project is based on hotel room count, rather than square footage, which is a more accurate reflection of actual parking demands associated with buildout of the NBC Project. Although there is a difference in parking spaces provided compared to</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>those analyzed by the Final EIR/EIS, these changes to the Project do not rise to the level of substantial changes requiring major revisions to the Final EIR/EIS or other Environmental Document examined in this Initial Study.</i>						
<p>(c) Substantially discourage the use of alternative modes of transportation or cause transit service capacity to be exceeded?</p> <p><i>The Downtown Planning area has an abundance of alternative transportation choices including the Coaster, Trolley, and bus lines. The proposed Project does not include components that would substantially discourage the use of alternative modes of transportation or cause transit service capacity to be exceeded.</i></p> <p><i>Additionally, SANDAG has indicated that transit facilities should be sufficient to serve the downtown population, including persons associated with the NBC project, without exceeding capacity. Therefore, no impact will occur associated with transit or alternative modes of transportation.</i></p>					X	X
16. MANDATORY FINDINGS OF SIGNIFICANCE						
(a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal					X	X

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?</p> <p><i>As indicated above, due to the highly urbanized nature of the downtown area, no sensitive plant or animal species, habitats, or wildlife migration corridors are located in the Project area. Furthermore, the Project would not eliminate important examples of major periods of California history or prehistory. No aspects of the Project would substantially degrade the environment.</i></p> <p><i>Consistent with the findings of the Final EIR/EIS, because the proposed Project will conform to the requirements of the Development Agreement and is virtually identical in terms of use and intensity, there would be no significant transportation impacts.</i></p>						
<p>(b) Does the project have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probably future projects)?</p> <p><i>Effects of the proposed Superseding Master plan on land use and applicable plans; aesthetics and viewshed; public services and utilities; and other issues would not be</i></p>		X				

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>significant and would not incrementally contribute to a significant cumulative impact associated with other planned projects for the downtown area nor the applicable planning documents for the area. Potential cumulative effects of the proposed Project and other foreseeable projects are not expected to be significant.</i></p> <p><u>Land Use and Applicable Plans</u></p> <p><i>There are a number of projects in the vicinity of the Project that are listed in the Downtown Community Plan and which have been analyzed at a program level in the Downtown Community Plan Final EIR. The Downtown Community Plan Final EIR identified increased development activities downtown would combine with those expected in surrounding neighborhoods to displace homeless populations, encouraging them to move into less active areas in surrounding neighborhoods. (Downtown Community Plan Final EIR, p. 6-8.) As concluded by the Downtown Community Plan Final EIR, existing programs offered to the homeless have not proven completely effective in meeting the needs of the homeless population. As there are no other measures identified in the EIR/EIS or the Downtown Community Plan Final EIR, this impact is inmitigable. However, unless related to an impact on the physical environment, a social or economic impact, such as homeless population displacement, is not a significant effect on the environment. (Pub. Resources Code, §§ 21090 subd. (e)(2), 21092.2 subd. (c); CEQA Guidelines § 15064, subd. (e).) As such, this impact is</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>not a significant environmental effect requiring preparation of an Environmental Impact Report.</i></p> <p><u><i>Aesthetics and Viewshed</i></u></p> <p><i>Downtown San Diego is experiencing rapid development and future downtown projects, especially those along the San Diego Bay waterfront, could result in potential impacts to important view corridors. Cumulative projects located along the waterfront in the vicinity of the proposed NBC project, include projects identified in the NEAVP, Land Field, County Waterfront Park, Bosa Pacific Highway at Ash, Seaport Village Expansion, Electra, the Columbia Commons, and Central Park and Old Police Headquarters. Although a substantial amount of development is occurring along the visually sensitive waterfront, Centre City Community Plan recognizes the importance of view corridors and contains policies to avoid substantial degradation of designated views.</i></p> <p><i>The Development Agreement specifies design measures to avoid aesthetic effects on surrounding areas, including height limits, setbacks, opening of public streets and related view corridors, and design guidelines to improve the appearance of the developed project at the NBC. The proposed Project is consistent with the requirements of the Development Agreement. The proposed Plan would not have an adverse aesthetic</i></p>						

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>effect, and the design measures incorporated into the proposed Project, as required by the Development Agreement, ensure that the project is compatible with surrounding development. Therefore, the proposed action would not contribute to cumulative aesthetics impacts.</i></p> <p><u>Public Services and Utilities</u></p> <p><i>The Development of projects listed above, as well as future projects anticipated in planning documents, would result in an increased demand on police and fire services. To meet anticipated demand for police services, the San Diego Police Department would need additional resources such as personnel, equipment, and training. The need for a new police substation has not been identified at this time and would be subject to independent environmental review. In response to increased development the San Diego Fire Department has secured a site for the construction of the new fire station. The proposed Project would not cumulatively contribute to the demand for additional services. Additionally, as indicated, the proposed Project would have no impact to the provision of schools in the area</i></p> <p><i>Under buildout conditions proposed in the Downtown Community Plan, the demand for treated water downtown would increase from approximately 8.62 million gpd to approximately 18.89 million gpd. The additional demand would not, however, represent</i></p>						

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>a substantial increase in the requirement to meet the anticipated demand for water within the SDCWA service area. (Downtown Community Plan EIR, pp. 5.4-13 – 5.4-14.) To meet the anticipated demand for improved water infrastructure, the city of San Diego Water Department would systematically replace or upsize deteriorating and undersized pipes through its Capital Improvement Projects program. Similarly, to meet anticipated sewer demands, the San Diego Metropolitan Wastewater Department would continue to replace deteriorating and undersized pipes through its Capital improvement Projects program. (Ibid.) Therefore, no significant cumulative impacts to water or sewer would occur.</p> <p><u>Population and Housing</u></p> <p>SANDAG provides projections of population, housing, and employment growth based on growth trends, land use patterns, and general plan land use designations. The SANDAG projections are cumulative in nature and are based on mixed-use development of the NBC site, as designated in the City of San Diego General Plan. In addition, the San Diego Downtown Community Plan acknowledges redevelopment of the NBC site. Development of the proposed Project would be consistent with regional growth projections for the site. Therefore, the proposed Project would not adversely affect cumulative socioeconomic projections.</p>						

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><u>Geology, Seismicity, and Soils</u></p> <p>Potential geologic and seismic effects for the proposed Project are site specific and would not be affected by, nor contribute to, cumulative impacts. In addition, the proposed Project would reduce the potential for seismic impacts onsite, as it would include earthquake-safe buildings, replacing the existing buildings that do not meet current earthquake standard requirements. Because all applicable codes and regulations would be met, impacts associated with geologic and seismic hazards, as well as from soil instability, would not be considered cumulatively significant.</p> <p><u>Hydrology and Water Quality</u></p> <p>Water quality in the vicinity of the project site is affected by pollution associated with urban runoff, mainly from impervious surfaces such as parking lots. Development downtown, including the NBC project as detailed by the Project, as well as other development guided by local plans, would increase pollution-generating activities and could subsequently result in additional water quality impacts to San Diego Bay. Most future development projects in downtown would be subject to NPDES regulations requiring BMPs to control potential effects on water quality. Both the Port District and the City have adopted Urban Runoff Management Programs that aim to reduce storm water pollution from downtown area. In addition, the NBC is located on a site that is</p>						

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p>currently urban in nature and developed mainly with impervious surfaces; therefore, redevelopment of the site would not incrementally increase areas of impervious surface within the surrounding area. Compliance with regulations set forth by the SWRCB, RIVQCB, Port District, and the City would reduce potential impacts to below a level of significance and ultimately improve the quality of runoff leaving the NBC site. The proposed Project would not, therefore, contribute to cumulative impacts to water resources.</p> <p><u>Air Quality</u></p> <p>The cumulative impacts analysis of the Final EIR/EIS concluded that implementation of the Development Agreement would incrementally contribute to the region's non-attainment of ozone and carbon monoxide standards, which is a cumulatively significant unmitigated impact. As indicated, because the San Diego Air Basin already is impacted, any new development would have a significant cumulative impact on regional air quality. Thus, implementation of the proposed Project would result in a significant cumulative air quality impact. Although the cumulative impact would be significant, the proposed Project would concentrate development in an area which is well served by transit and offers a variety of opportunities to work and live in the same area. This conclusion is consistent with the conclusions of the Final EIR/EIS.</p>						

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<u>Noise</u> <i>Noise, by definition, is a localized phenomenon and drastically reduces in magnitude as distance from the source increases. As a result, only projects and growth due to occur in the immediate vicinity of the proposed action would be likely to contribute to cumulative noise impacts. Construction activities associated with the proposed Superseding Master Plan would likely contribute to cumulative noise impacts. Construction activities would be short term and would comply with County Noise Ordinance construction standard and thus, would not result in an incremental significant effect to noise levels in the area. The addition of traffic associated with the proposed Project would contribute to increases in noise along roads, most notably along North Harbor Drive. Although these increases would be potentially noticeable from adjacent receivers, the street segments surrounding the NBC site are highly urbanized, and therefore elevated noise levels are expected. In addition, compliance with Title 24 of the California Code of Regulations would mitigate vehicular noise impacts that would exceed the interior significant thresholds for most development. Therefore, the proposed Project's contribution to noise impacts would not be cumulatively considerable.</i> <u>Historical Resources</u>						

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<p><i>As explained by the Final EIR/EIS, unless the NBC Project would affect a historic district, cultural/historical resources impacts from NBC development are considered site specific. (Final EIR/EIS, p. 5-3.) The area surrounding the site is not a historic district; therefore development on the site under the proposed Project would not create cumulative historical resource impacts.</i></p> <p><u>Public Health and Safety</u></p> <p><i>As described in the Final EIR/EIS, public health (i.e. hazardous waste) and safety (i.e. proximity to an airport) impacts are site specific and would not be affected by other development.</i></p>						
<p>(c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?</p> <p><i>As described elsewhere in this study, the proposed project would result in significant impacts. However, these impacts would not be greater than those assumed in the Final EIR/EIS. Implementation of the mitigation measures identified in the Final EIR/EIS, as well as those required by the Downtown Community Plan Final EIR, would mitigate many, but not all, of the significant impacts. The proposed project would result in</i></p>		X				

Navy Broadway Complex Project Development Agreement, Superseding Master Plan and Phase I Buildings

	Significant And Not Mitigated (SNM)		Significant But Mitigated (SM)		Not Significant (NS)	
	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)	Direct (D)	Cumulative (C)
Issues and Supporting Information						
<i>significant project level and/or cumulative impacts related to air quality. Other significant direct impacts associated with implementation of the proposed Project would be mitigated to a level less than significant with incorporation of mitigation measures identified in the Final EIR/EIS as well as applicable Mitigation Measures identified in the Final EIR for the Downtown Community Master Plan.</i>						

(R-93-594)

RESOLUTION NUMBER R- 280915ADOPTED ON OCT 26 1992

A RESOLUTION OF THE COUNCIL OF THE CITY OF SAN DIEGO CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE NAVY BROADWAY COMPLEX, CERTIFYING THAT THE CITY COUNCIL HAS REVIEWED AND CONSIDERED INFORMATION CONTAINED IN SAID FINAL ENVIRONMENTAL IMPACT REPORT AND IN THE FINAL MEIR FOR THE CENTRE CITY REDEVELOPMENT PROJECT, MAKING CERTAIN FINDINGS REGARDING THE ENVIRONMENTAL IMPACTS OF THE PROPOSED REDEVELOPMENT OF THE NAVY BROADWAY COMPLEX, ADOPTING A REPORTING AND MONITORING PROGRAM, AND ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS.

WHEREAS, the United States of America owns approximately 16 acres of waterfront land in the downtown area of the City of San Diego which is known as the Broadway Complex of the Department of the Navy, San Diego, California (the "Navy Broadway Complex"); and

WHEREAS, pursuant to Section 2732 of the National Defense Authorization Act for Fiscal Year 1987, P.L. 99-661, Congress has authorized the Navy to enter into a long-term lease with a developer pertaining to the real property located within the Navy Broadway Complex, provided that any real property leased shall be developed in accordance with detailed plans and terms of development which have been duly formulated by the Navy and the San Diego community through the San Diego Association of Governments' Broadway Complex Coordinating Group; and

WHEREAS, this City Council proposes to approve an Agreement between The City of San Diego and the United States of America Adopting a Development Plan and Urban Design Guidelines for the

Redevelopment of the Navy Broadway Complex (the "Development Agreement") providing for the coordination by the Navy and the City in implementing the redevelopment of the Navy Broadway Complex; and

WHEREAS, the Navy was designated as the lead agency to prepare an Environmental Impact Statement ("Final EIS") to assess the environmental impacts which may result from the redevelopment of the Navy Broadway Complex pursuant to the National Environmental Policy Act of 1969 ("NEPA") and federal guidelines and regulations adopted pursuant thereto; and

WHEREAS, the City Council was designated as the lead agency to prepare an Environmental Impact Report ("Final EIR") to assess the environmental impacts which may result from the redevelopment of the Navy Broadway Complex pursuant to the California Environmental Quality Act of 1970 ("CEQA"), as amended, and state and local guidelines and regulations adopted pursuant thereto; and

WHEREAS, as permitted by CEQA, the Final EIR was prepared and reviewed in coordination with and incorporating the Final EIS (so that all references herein are also references to the Final EIS), and is comprised of the following documents:

Draft Environmental Impact Statement for the Navy Broadway Complex Project. Department of the Navy. April 1990.

Draft Environmental Impact Report for the Navy Broadway Complex Project. City of San Diego. April 1990.

Final Environmental Statement for the Navy Broadway Complex Project. Department of the Navy. October 1990.

Final Environmental Impact Report for the
Navy Broadway Complex Project. City of San
Diego. October 1990; and

WHEREAS, the Navy and the City prepared and circulated a Draft EIS and EIR for review, comment and consultation with citizens, professional disciplines and public agencies pursuant to applicable law; and

WHEREAS, duly noticed public hearings were held by the Navy and the City with respect to the Draft EIS and EIR, at which all interested persons and organizations were given an opportunity to be heard; and

WHEREAS, the Final EIS and EIR relating to the proposed redevelopment of the Navy Broadway Complex, and responding to the concerns raised during the review period and at the public hearings, has been prepared pursuant to NEPA and CEQA and the guidelines and regulations; and

WHEREAS, the Redevelopment Agency of The City of San Diego (the "Agency") has previously prepared, and the Agency (Resolution No. 2081) and the City Council (Resolution No. R-280915) have certified the Final Master Environmental Impact Report for the Centre City Redevelopment Project ("Final MEIR"); and

WHEREAS, the redevelopment of the Navy Broadway Complex as provided for in the proposed Development Agreement is a redevelopment implementation activity whose environmental impacts are assessed in the Final MEIR; and

WHEREAS, the City Council in connection with its consideration of the approval of the proposed Development Agreement for the Navy Broadway Complex, has reviewed and

considered the information contained in the Final EIR (including the Final EIS) and in the Final MEIR; NOW, THEREFORE,

BE IT RESOLVED, by the Council of The City of San Diego, as follows:

1. That the City Council hereby certifies that the Final EIR for the Navy Broadway Complex has been prepared and completed in compliance with CEQA and state and local guidelines and regulations adopted pursuant thereto.

2. That the City Council hereby further certifies that the information contained in the Final EIR (including the Final EIS), and in the Final MEIR, has been reviewed and considered by the members of the Council.

3. That the City Council hereby finds and determines that:

a. The redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, will not result in significant environmental effects in certain respects identified in the Final EIR, as described in Section I of Attachment A (attached hereto and incorporated herein by this reference).

b. Changes or alterations have been required in, or incorporated into, the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, which avoid or substantially lessen certain significant environmental effects of the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, identified in the Final EIR, as described in Section II of Attachment A.

c. Changes or alterations which avoid or substantially lessen certain significant environmental effects of the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, identified in the Final EIR, are within the responsibility and jurisdiction of another public agency and not the City Council, and such changes have been adopted by such other agency, or can and should be adopted by such other agency, as described in Section III of Attachment A.

d. With respect to significant environmental effects of the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, which cannot be avoided or substantially lessened, specific economic, social or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR, as described in Section IV of Attachment A.

e. The significant environmental effects of the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, which cannot be avoided or substantially lessened are acceptable due to overriding concerns, as described in Section V of Attachment A.

4. The City Council hereby further finds and determines that, for the reasons described in Sections I, II, III and IV of Attachment A:

a. No substantial changes are proposed in the Centre City Redevelopment Project, or with respect to the circumstances under which the Project is to be undertaken,

as a result of the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, which will require important revisions in the Final MEIR for the Project, due to the involvement of new significant environmental impacts not covered in the Final MEIR; and

b. No new information of substantial importance to the Project has become available which was not known or could not have been known at the time the Final MEIR for the Project was certified as complete, and which shows that the Project will have any significant effects not discussed previously in the Final MEIR, or that any significant effects previously examined will be substantially more severe than shown in the Final MEIR, or that any mitigation measures or alternatives previously found not to be feasible or not previously considered would substantially reduce or lessen any significant effects of the Project on the environment; and

c. No negative declaration, or subsequent environmental impact report, or supplement or addendum to the Final MEIR is necessary or required; and

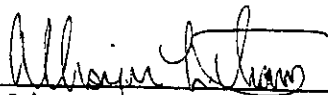
d. The redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, will have no significant effect on the environment, except as identified and considered in the Final MEIR for the Project.

5. That the Mitigation Monitoring Program for the Navy Broadway Complex, in the form on file in the office of the City Clerk as Document No. RR280915, is hereby approved and adopted

to monitor and ensure that the mitigation measures identified will be instituted.

6. That the City Clerk (or his designee) is hereby authorized and directed to cause the filing of a Notice of Determination with respect to the Final EIR and Final MEIR, upon approval of the proposed Development Agreement by the City Council.

APPROVED: JOHN W. WITT, City Attorney

By 
Allisyn L. Thomas
Deputy City Attorney

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Attachment A

- I. The following discussion explains the reasons why, in certain respects, the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, will not result in significant environmental effects.

A. With respect to land use:

Redevelopment of the Navy Broadway Complex is compatible with surrounding land uses and provides actual pedestrian uses such as open space area, pedestrian corridors and a waterfront museum. It would substantially improve waterfront access by extending E, F and G streets through the site to the waterfront and providing pedestrian-oriented improvements.

B. With respect to parking:

With implementation of a Travel Demand Management program, sufficient parking would be provided to meet parking demands onsite.

C. With respect to biology:

The project site is fully developed with urban uses and has been for several decades. As such, there are no areas of the site where biological resources are located that are not substantially disturbed.

D. With respect to water:

Water for the project area is supplied by the City of San Diego under the administration of the Water Utilities Department. Since the existing water facilities in the project vicinity are currently operating well within their service capacity, there would be no significant impacts to water service from any of the alternatives considered.

E. With respect to solid waste:

Solid waste disposal in the project area is provided by the combined services of the City of San Diego and private contractors. The largest increase of solid waste would occur with the Alternative A, the Alternative B, the Alternative D, and Alternative F, from which an anticipated 13,300, 15,600, 19,700, and 13,800 tons, respectively, would be generated per year. Alternative C and Alternative E would result in lesser increase to

solid waste generation (i.e., 9,200 and 7,300 additional tons per year over existing uses, respectively). The West Miramar landfill will provide adequate solid waste disposal through 1995, and the City of San Diego is currently planning to develop new landfills, or expand existing ones, to serve the city's future disposal requirements, so no significant impacts to solid waste disposal are anticipated with implementation of any of the alternatives.

F. With respect to the physical environment:

No known extractable resources are located on or beneath the site. The project site is level, at street grade, and covered with impervious surfaces. Implementation of Alternatives A through F would result in sedimentation during demolition and construction activities as subsurface soils are exposed to runoff. No long-term increase in runoff would occur since the Navy Broadway Complex site is already fully developed.

G. FINAL MEIR

As described in Item I of Attachment A of Agency Resolution No. 2081 and City Council Resolution No. 279875 certifying the Final MEIR and incorporated by reference.

The Final MEIR found that in the areas of biological resources, mineral resources, solid waste collection and hydrology/water quality would not result in significant environmental effects.

1. With respect to biological resources:

The Centre City Planning Area is located in the heavily urbanized setting of downtown San Diego, which is almost totally lacking in native vegetation and its associated wildlife.

2. With respect to mineral resources:

The potential for economically viable extraction of mineral resources is limited due to the urbanized nature of the Planning Area. The area has not been designated as having a high potential for mineral resources.

3. With respect to solid waste collection:

Solid waste disposal in the Planning Area is provided by the combined services of the City of San Diego and private contractors. New development will be required to

contract with licensed private haulers for collection of waste and no significant impacts to solid waste collection services are expected.

4. With respect to hydrology/water quality:

The Planning Area is a highly urbanized area, currently developed with low and high-rise buildings, streets, sidewalks, and parking areas. New development proposed under the Centre City Community Plan is not expected to increase the volume of stormwater runoff in the Planning Area.

No significant impacts were identified in relation to erosion, however the implementation of standard erosion control procedures will be required in accordance with existing City of San Diego regulations.

All development activities shall be conducted in compliance with regulatory requirements pertaining to dewatering. Therefore, no significant impacts will occur.

- II. The following discussion explains the reasons why certain changes or alterations which have been required in, or incorporated into, the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, will avoid or substantially lessen certain significant environmental effects of the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement.

A. TRAFFIC

Long-Term Intersection Impacts

Redevelopment of the Navy Broadway Complex would result in long-term intersection traffic impacts. The operation of several intersections in the vicinity of the project site would be substantially affected. The intersections are Grape/Pacific, Broadway/Pacific, and Broadway/Front. Traffic from the project will reduce the level of service (LOS) from C to E at Grape/Pacific, from LOS E to F at Broadway/Pacific, and from LOS D to E at Broadway/Front.

The significant effects related to long-term intersection impacts have been eliminated or substantially lessened to a level less than significantly by virtue of project design considerations and the mitigation measures identified in the Final EIR and incorporated into the project. The following improvements that are planned either by the Centre City Transportation Action Plan (CCTAP) or Centre City Development

Corporation (CCDC) will reduce the project's contribution to intersection impacts:

- Pacific/Grape: Pacific Highway currently provides three through lanes in each direction and a southbound left-turn pocket. Grape Street has three eastbound lanes and an eastbound right-turn pocket and will be restriped and reconfigured to provide for a 4-lane section. This improvement will result in service level D conditions under the long-term scenario and will be installed by the City of San Diego when the service levels at this intersection exceed acceptable levels based on current traffic counts.
- Broadway/Front: Broadway provides two through lanes in each direction and a westbound left-turn lane. Front Street has three through lanes in the southbound direction and will be restriped and reconfigures to provide for a 4-lane section. This improvement will result in service level D conditions under the long-term scenario and will be installed by the City of San Diego when the service levels at this intersection exceed acceptable levels based on current traffic counts.
- Broadway/Pacific: Pacific Highway currently provides three through lanes in each direction and a southbound left-turn lane. Broadway has two through lanes in each direction and a westbound left-turn lane. The improvements include the provision of additional turn lanes in the northbound, eastbound, and westbound directions and will result in level of service D conditions under the long-term scenario. They will be installed by the City of San Diego upon initiation of development of any block on the Navy Broadway Complex. The improvements are summarized as follows:
 - Exclusive northbound left-turn lane
 - Exclusive northbound right-turn lane
 - Exclusive eastbound right-turn lane
 - Second westbound left-turn lane
- A traffic signal at the intersection of Harbor Drive and the new connection to Harbor Drive north of Broadway will alleviate traffic impacts that result from the redirection of traffic around Broadway and the proposed open space area. Improvements to this intersection will be installed by the City of San Diego upon completion of the

open space area at the foot of Broadway.

Implementation of the last two mitigation measures shown above will be governed by a phasing plan. The phasing plan for each stage of development is included in the EIR, and requires that associated mitigation measures be implemented in conjunction with the development of any individual block on the project site. The phasing plan will include the installation of access-related improvements to Pacific Highway as well as the extension of E Street, F Street, or G Street from Harbor Drive to Pacific Highway.

- Long-Term Travel Demand Management (TDM) Program:
A TDM program will be designed to reduce the number of vehicular trips, thereby reducing associated traffic impacts and parking needs. The TDM program will be put in place prior to the occupancy of any new structures and will be incorporated into all commercial leases. This program will incorporate a variety of measures which may include some or all of the following:
 - Onsite transit amenities
 - Transit pass sale and information area
 - Coordination of a rideshare matching system
 - Preferential carpool and/or vanpool parking
 - Onsite bike lockers
 - Development of pedestrian corridors to transit stops/stations
 - Shared parking arrangement through mix of land uses

Long-Term Roadway Segment Impacts

Fourteen roadway segments in the vicinity of the project will operate above their capacity as a result of area wide development. Traffic from the proposed project will contribute substantially and significantly to overcapacity conditions along segments of Pacific Highway (south of Broadway) and First Avenue (south of Ash).

The significant effects to road segments related to additional project traffic generation have been eliminated or substantially reduced to a level less than significant by virtue of project design considerations and the mitigation measures identified in the Final EIR and incorporated into the project. CCTAP and CCDC have programmed improvements for both of the segments for which the project would contribute to significant increases in traffic levels. The following planned improvements along Pacific Highway and First Avenue would reduce expected impacts along these two road segments to a less than significant level:

- First Avenue: First Avenue will be restriped and reconfigured to provide for a 4-lane section. This improvement, to be installed by the City of San Diego, will be implemented when roadway volumes on this segment exceed acceptable levels based on current traffic counts.
- Pacific Highway: Pacific Highway will be widened to add new travel and turn lanes adjacent to the site. Traffic signals will be added at the intersections of G Street/Pacific, F Street/Pacific, and E Street/Pacific. The improvements will be installed by the City of San Diego in a phased manner upon development of individual blocks in the Navy Broadway Complex.

B. PUBLIC SERVICES

Impact on Schools

The project area is within the boundaries of the San Diego Unified School District (SDUSD). The SDUSD provides public school facilities for grades K through 12. A majority of SDUSD's schools are currently operating near or over their capacity. The number of Navy personnel in the region would remain unchanged, but potential immigration of families associated with onsite private development will increase the number of school age children. Secondary schools in the area are generally operating below their capacity, while elementary schools are generally operating over their capacity. The combined capacity of these schools (i.e., 63,990) has already been exceeded by over 2,300 students. Implementation of the private uses on the Navy Broadway Complex Project could result in indirect adverse impacts to elementary schools.

To alleviate the current overcrowding of schools in the area, the SDUSD is levying school impact fees as authorized by California Government Code Section 53080 for the long-range planning and construction of new facilities. Section 53080.1 allows for an appeal of the imposition of the fee to challenge the applicability of student-generation factors associated with the project.

The project would not directly contribute students to the elementary and secondary schools within the San Diego Unified School District since residential uses are not being proposed. An influx of new non-military personnel associated with onsite private development could cause secondary impacts to schools in the San Diego area that are near or over capacity. The Navy office component of any of the alternatives would not result in increased Navy personnel in the region, so no mitigation measures for Navy offices are necessary. The

significant effects to schools in the San Diego area related to the influx of families associated with private development have been eliminated or substantially lessened to a level less than significant by virtue of the following mitigation measure:

- A school facilities fee shall be paid in an amount established in accordance with California Government Code Sections 53080, 53080.1, and 65995.

Wastewater Impacts

The project would generate 250,495 gallons of wastewater per day. The additional wastewater generated by this project would significantly increase the amount of wastewater conveyed through existing sewer facilities and could cause the conveyance facilities to operate above their capacity.

The significant effects related to additional wastewater generation have been eliminated or substantially reduced to a level less than significant by virtue of project design considerations and a mitigation measure identified in the Final EIR and incorporated into the project. This measure is as follows:

- The existing 15-inch diameter mains located in Pacific Highway and in Market Street will be upgraded by the project developer, in coordination with the City of San Diego, to a capacity sufficient to serve future onsite development, as well as future upstream and tributary developments that would be linked to them. As recommended in a sewer pipeline capacity analysis, 1,800 linear feet of sewer line will be replaced from the intersection of Pacific Highway and E Street to the intersection of Market Street and Kettner Boulevard. The sewer line will be constructed upon demand for a new line created by the project.

C. PHYSICAL ENVIRONMENT

Effects from Soils and Erosion

During construction onsite soils will be exposed to rain and other hydraulic forces that could eventually convey sediments to the ocean, potentially affecting marine life.

The significant effects due to erosion and exposure to hydraulic forces have been eliminated or substantially reduced to a level less than significant by virtue of project design considerations and the mitigation measure identified in the Final EIR, incorporated into the project. The following

measure would mitigate any impacts from soil erosion during construction:

- An erosion control plan will be implemented during construction of new structures at the Navy Broadway Complex site. The plan will be prepared by the project developer and submitted to the City for approval prior to the initiation of construction. Major components of the plan will include (but not be limited to) the following:
 - Regular watering of exposed soil.
 - Hydroseeding of large (1-acre-plus) areas of exposed surface soils that will remain exposed and undisturbed by construction for 3 or more months at a time.
 - Draining any areas where ponding occurs.
 - Placing sandbags in gutters and near storm drains wherever construction activities occur.

Effects from Geologic Hazards (Faulting and Seismicity)

The site lies generally within the Rose Canyon fault zone. The possibility of a fault bisecting the site and strong groundshaking will have to be considered in the design and placement of structures. Design will also have to consider the potential for liquefaction.

The significant effects related to geologic hazards have been eliminated or substantially reduced to a less than significant level by virtue of upgrading the design criteria above that required by the City of San Diego to UBC Seismic Zone 4, and by considering the remedial measures for fault surface rupture, seismic groundshaking, and liquefaction outlined in "Additional Geologic, Seismic, and Geotechnical Studies, Navy Broadway Complex, San Diego, California," prepared by Woodward-Clyde Consultants (dated September 5, 1990) in the design and construction of all new buildings.

D. AIR QUALITY

Effects of Construction Dust Generation

Construction activities are a source of fugitive dust emissions that may have a substantial temporary impact on local air quality. Emissions are associated with demolition, ground excavation and site preparation. Dust emissions vary substantially from day to day, depending on the level of activity, the specific operations, and the prevailing weather.

Fugitive dust created during construction could result in short-term nuisance impacts.

The significant effects related to construction dust generation have been eliminated or substantially reduced to a level less than significant by virtue of project design considerations and the mitigation measures identified in the Final EIR and incorporated into the project. The factor used in the EIR to determine dust generation does not take into account the relatively high water table at the Navy Broadway Complex, which results in moister soil and less dust generation. Dust control through regular watering and other fugitive dust abatement measures required by the San Diego Air Pollution Control District (APCD) can reduce dust levels by 50 to 75 percent. Dust emission rates, therefore, depend on the length of the construction activities and the care with which dust abatement procedures are implemented. The maximum dust generation (not considering the higher moisture content of onsite soils) would be approximately 4.7 tones per month. With dust control measures, the total is reduced to about 2 tons per month of construction activity.

While the overall dust generation is substantial, the daily rate of fugitive dust generation is well within the dispersive capacity of the air basin without any adverse air quality impacts. It should also be noted that much of this dust is comprised of large particles that are easily filtered by human breathing passages and settle out rapidly on nearby foliage and horizontal surfaces. The dust thus comprises more of a nuisance rather than any potentially unhealthful air quality impact. With implementation of the following measures and other dust abatement procedures, even the short-term impact is lessened to an insignificant level.

- Fugitive dust will be controlled by regular watering as required by the San Diego Air Pollution Control District and through erosion control and street washing to reduce dirt spillage onto traveled roadways near the construction site. This measure will be implemented by the project developer and will be required to be included in construction documents.

Long-Term Vehicular Emission Impacts

The proposed project will generate 23,000 total vehicle trips per day. These vehicle trips will generate 270 pounds per day of total organic gases, 2,406 pound per day of carbon monoxide and 445 pounds per day of nitrogen oxides. The project will contribute to an already existing violation of the ozone standard and intensify the current air quality problem in the San Diego Air Basin.

The project would generate, without mitigation, approximately 38,000 trips. Up to 40 percent of these trips (16,000) are associated with Navy personnel relocated to the site. These personnel are already located in the San Diego Air Basin, and would simply be relocated to the Navy Broadway Complex. This consolidation provides substantial opportunities to reduce regional emission loads associated with commute trips by these personnel, as discussed below.

A Travel Demand Management (TDM) plan will be implemented as part of the project to substantially reduce single-occupancy vehicle usage at the site. In addition, the site is located within walking distance of a commuter rail, an AMTRAK rail station, 10 bus lines, and two light-rail transit lines (one is under development). This provides a substantial opportunity for utilizing mass transit and reducing single-occupancy vehicle use. By consolidating Navy personnel from a number of smaller, dispersed facilities to a single facility proximate to these transit opportunities, single-occupancy vehicle usage by Navy personnel can be substantially reduced in the air basin, with estimated reductions of 40 percent. Vehicle trips that are new to the San Diego Air Basin would constitute the remaining approximately 60 percent of the project's trip generation. TDM will also help alleviate impacts from vehicle trips that are new to the San Diego region. Based on City of San Diego estimates of TDM effectiveness, the TDM measures proposed for this project and the project's proximity to mass transit are estimated to reduce daily vehicle trips from each of the proposed land uses by the following amount:

<u>Land Use</u>	<u>Estimated Trip Reduction by TDM</u>
Office	60 percent
Hotel	25 percent
Retail	15 percent

Implementation of the TDM plan will reduce the total number of project trips by approximately 40 percent, which will substantially reduce potential vehicular emissions. After application of the TDM plan, trips associated with the mixed-use development would be approximately 23,000. If the existing 15,000 vehicles that are associated with Navy personnel located throughout the air basin are discounted, the net increase in daily vehicle trips would be reduced to 7,000. These net trip levels assume that all of the remaining vehicles are new to the air basin, a premise which probably overstates the new vehicle travel.

The California Air Resources Board indicates that measures to substantially reduce the number of single-occupancy vehicles

would be the primary determinant of consistency with the current (1982) and proposed State Implementation Plan (SIP). Long-term vehicular emissions will be substantially reduced through implementation of an extensive Travel Demand Management Program primarily aimed at reducing the use of single-occupancy vehicles. Therefore, the Navy Broadway Complex Project would be consistent with the current (1982) and proposed SIP. The significant long-term project-specific effects to air quality related to vehicular emission levels have been eliminated or substantially lessened to a level less than significant by virtue of the nature of the project and the mitigation measures identified in the Final EIR (see Traffic discussion in these findings, page 4) and incorporated into the project.

E. NOISE

Temporary Construction Noise Impacts

Noise generated by construction equipment, including earth movers, material handlers, and portable generators can reach high levels. Implementation of the project would cause a short-term annoyance to noise-sensitive land uses in the surrounding area due to construction activities. The area is frequented by visitors, especially on weekends. This impact may be considered a significant nuisance impact to users of the nearby waterfront during the construction period.

The significant effects related to short-term noise generation have been eliminated or substantially lessened to a level less than significant by virtue of project design considerations and the mitigation measures identified in the Final EIR and incorporated into the project. These measures are as follows:

- A looped 12kV system will be constructed by the project developer in phases to provide adequate electricity to the various individual structures within the Navy Broadway Complex as they are developed.
- Coordination by project developers will occur with SDG&E regarding recommendations on energy conservation measures. All private development will be constructed in accordance with Title 24 of the California Administrative Code, which provides energy conservation measures.

F. CULTURAL RESOURCES

Impacts on Historic Structures

The project will have a significant impact on cultural

resources. Based on Criterion C of 36 CFR 60.4, Buildings 1, 11, and 12 appear to meet National Register Criteria as a single architectural and historical group. They represent the entire development history of the Navy Broadway Complex and are primary contributing features to the overall character of this area of the San Diego waterfront. These buildings form an architectural unit, and are tied together both in terms of general form (design) and function. They are all designed in compatible utilitarian/industrial styles, and retain a high degree of integrity. Impacts would result from the removal or substantial renovation (modification of the exterior and interior components) of portions of Buildings No. 1 and No. 12. Building 11 is beyond the project limits and would not be affected by the proposed project.

In order to determine appropriate steps to mitigate the impacts of these cultural resources, the Navy has consulted with the California State Historic Preservation Office (SHPO) and the Advisory Council on Historic Preservation. The significant effects related to removal or substantial alterations of these buildings have been eliminated or substantially lessened to a level less than significant by virtue of project design considerations and the mitigation measure identified in the Final EIR and incorporated into the project.

- The Navy will record Buildings 1 and 12 pursuant to Section 110(b) of the National Historic Preservation Act and will monitor excavations to ensure that no significant archaeology is inadvertently lost.

G. PUBLIC HEALTH AND SAFETY

Impacts from Soil Contamination

Several areas of contamination or potential contamination were identified on the site that could adversely affect the health of personnel on the site, especially during construction activities that uncover soils. Minor hazardous waste spills were located or may be located on the site. In addition, transformers that contain PCB's are located on the site, although none are known to be leaking. There are no known major hazardous waste spills or leaking underground storage tanks on the site. Because the presence of hazardous waste can affect public health, this represents a significant impact.

The significant effects related soil contamination have been eliminated or substantially lessened to a level less than significant by virtue of project design considerations and the mitigation measures identified in the Final EIR and

incorporated into the project. These measures are as follows:

- If any underground storage tanks on the site are found to be leaking, such leaks will be cleaned up in accordance with the Resource Conservation and Recovery Act (RCRA) and any other applicable state or City of San Diego regulations, with clean up being initiated upon discovery of any leaks.
- If evidence of hazardous materials contamination is discovered, the EPA will be promptly notified and all applicable requirements of the Comprehensive Emergency Response Compensation and Liability Act and the Superfund Amendment and Reauthorization Act (CERCLA/SARA) and the National Contingency Plan (NCP) will be complied with.
- If CERCLA hazardous substances are discovered, no construction will occur until the requirements of CERCLA/SARA and the NCP have been fully satisfied. CERCLA/SARA/NCP activities would take priority over new construction until CERCLA/SARA compliance has been achieved.
- Prior to construction, the area beneath existing Building 8 will be further investigated for the presence of hazardous materials in the soils. If any contaminated soils are found, they will be cleaned up in accordance with EPA regulations.
- The fluid in transformers and other electrical units will be tested prior to onsite construction to determine the presence of PCBs. If PCBs are found, the fluid and the units will be disposed of at an approved waste disposal facility in accordance with the Toxic Substance Control Act (TSCA).
- The soil in the vicinity of the forklift maintenance area at existing Building 106 will be tested for acidity prior to development in this area. If the pH of the soil is less than 5, the pH will be adjusted so that it is greater than 5.
- The oily residue-stained soil and paving materials in the vicinities of existing Buildings 7 and 106 will be removed to the satisfaction of the EPA prior to development in this area and disposed of in an approved disposal facility.

Effects Related to Asbestos

Development of the project would pose significant health exposure risks associated with demolition of buildings that contain asbestos. During demolition, asbestos fibers could become airborne, thereby providing a pathway to enter the human system. Asbestos exposure is considered a human health risk, and building demolition required by the project would be considered a significant health impact.

H. FINAL MEIR

As described in Item II of Attachment A of Agency Resolution No. 2081 and City Council Resolution No. 279873 certifying the final MEIR and incorporated by reference.

It was found the potential land use incompatibilities, transportation and circulation impacts, air quality impacts, noise impacts, cultural resources, demolition of potential impacts to police, fire protection services, libraries, potable water distribution, stormwater collection and solid waste collection, groundwater impacts, geological hazards, hazardous materials contamination and potential loss of paleontological resources, impacts will be mitigated to below a level of significance.

The Navy Broadway Complex Final EIR found project-specific impacts (as described above in Sections A-H) which may be possible regarding traffic, public services, physical environment, air, noise, cultural resources, public health and safety. Several of the potential impacts are related to the fact that now there is a specific development proposal which may not match the general assumptions addressed in the Final MEIR. It is anticipated that many, if not all potentially significant impacts associated with the Navy Broadway Complex will be mitigated.

- III. The following discussion explains the reasons why changes or alterations which avoid or substantially lessen certain significant environmental effects of the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, are within the responsibility and jurisdiction of another public agency and not the City Council, and how such changes have been adopted by such other agency or can and should be adopted by such other agency.

A. PUBLIC HEALTH AND SAFETY

Impacts Associated with Contamination of Groundwater

The project includes subsurface parking and would likely include subsurface foundation components. Groundwater is

located at approximately 7 to 11 feet below the ground surface of the site. Subsurface construction would encounter substantial quantities of groundwater, and a temporary groundwater dewatering program would be required during construction. Although it is unlikely that any contaminated groundwater would be encountered during temporary dewatering activities, it was found that the dewatering program associated with the nearby Convention Center may have promoted migration of the contaminated plume in the direction of that project. It is conceivable that temporary groundwater dewatering associated with project development could cause migration of the plume, or of a currently unknown source of contaminated groundwater, towards the Navy Broadway Complex.

The significant effects related to contaminated groundwater have been eliminated or substantially reduced to a level less than significant by virtue of project design considerations and the mitigation measure identified in the Final EIR and incorporated into the project. The measure is as follows:

- Authorization to temporarily discharge dewatering waste during project construction will be obtained from the executive officer of the Regional Water Quality Control Board (RWQCB) under NPDES CA 0108707.

B. FINAL MEIR

As described in Item III of Attachment A of Agency Resolution No. 2081 and City Council Resolution 279875 certifying the Final MEIR and incorporated by reference.

1. With respect to project-specific mitigation for projects within the planning jurisdiction of government agencies other than the City of San Diego:

Project-specific mitigation would be required for a number of potential impacts including potentially significant land use incompatibilities, air quality impacts during construction, CO hotspots, noise impacts, demolition of historically significant buildings, potential loss of subsurface cultural resources, wind acceleration, impacts to public facilities and services, geological hazards, ground-water impacts, hazardous materials contamination and potential loss of paleontological resources.

Other government agencies with planning jurisdiction in the Planning Area include the San Diego Unified Port District (Port District), the County of San Diego, the U. S. Navy, the

San Diego Association of Governments (SANDAG) and the California Coastal Commission. The County of San Diego has planning jurisdiction over County-owned property in Centre City used for a County purpose; the U. S. Navy controls a large developed parcel adjacent to the waterfront (the Broadway Complex) and an adjacent pier; and SANDAG is the designated Airport Land Use Commission for Lindbergh Field. Lindbergh Field's Airport Influence Area extends across a portion of the Planning Area. The Centre City waterfront is under the jurisdiction of the San Diego Unified Port District and the California Coastal Commission. However, the Coastal Commission has delegated its coastal zone authority to the City of San Diego and the Port District as a result of their certification of the Local Coastal Program and Port Master Plan.

The U. S. Navy has entered into a memorandum of understanding (MOU) with the City of San Diego providing for cooperation in the future development of the Navy Broadway Complex. The MOU specifies that the Navy, in consultation with the City of San Diego, will prepare a development plan and urban design guidelines that will define the nature of development that will occur on the Navy Broadway Complex.

2. With respect to transit ridership:

Traffic related impacts would be mitigated primarily by increasing the percent of transit ridership to 60 percent by the year 2025. It is estimated that an additional 440 buses, 305 trolley cars and 55 commuter rail cars would be required for the routes serving the Planning Area during the AM peak hour. This mitigation measure would be the responsibility of the Metropolitan Transit Development Board (MTDB).

3. With respect to freeways:

Impacts to key freeway segments and ramps will need to be mitigated through measures such as ramp metering, ramp widening and providing additional lanes for both freeways and ramps. These measures would be the responsibility and jurisdiction of the California Department of Transportation (Caltrans). The Redevelopment Plan provides Agency participation with Caltrans to widen various freeway ramps in the Planning Area and these mitigation measures can and should be adopted by Caltrans.

4. With respect to air quality:

Similar to traffic impacts, the mitigation of CO hotspots is dependent in part on the implementation of a 60 percent transit mode split by the year 2025. Provision of the needed additional buses, trolley cars and commuter rail cars is not

within the jurisdiction of the City or Agency, but rather the Metropolitan Transit Development Board.

- IV. The following discussion explains the reasons why specific economic, social or other considerations make infeasible the mitigation measures or project alternatives with respect to each significant environmental effect of the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, which cannot be avoided or substantially lessened.

A. LONG-TERM VEHICULAR EMISSIONS--CUMULATIVE IMPACT ON AIR QUALITY

The Regional Air Quality Strategy establishes a goal of maintaining a Level of Service (LOS) C or better at intersections to reduce idling times and vehicular emissions. Cumulative development in the project vicinity would create congestion (LOS D or below) at six intersections. The proposed project would contribute a substantial increment to this congestion at one or two of these intersections. City of San Diego standards provide that this incremental contribution to the region's non-attainment of ozone and carbon monoxide standards is a cumulatively significant unmitigated impact.

The significant effect has been substantially reduced to the extend feasible by virtue of the design considerations and the mitigation measures identified in the Final EIS and incorporated into the project. The San Diego Basin is a non-attainment area for ozone, nitrogen dioxide, and carbon monoxide. The project would include transportation demand management measures (TDM) that would substantially reduce the potential air quality impacts of the project. Incorporation of the TDM would, according to the California Air Resources Board, demonstrate consistency with the State Implementation Plan. Nevertheless, after implementation of all feasible mitigation measures, the project would continue to contribute substantial traffic to a congested intersection and would therefore contribute significantly to an unmitigated impact.

The chief goal of CEQA is mitigation or avoidance of environmental harm. Alternatives and mitigation measures fulfill the same function of diminishing or avoiding adverse environmental effects. When a significant environmental impact remains after implementation of mitigation measures, a reasonable range of alternatives need to be evaluated and either adopted or shown to be ineffective or infeasible as a means to reduce or prevent detrimental effects to the environment. The final EIR

evaluated six alternatives in addition to the proposed project. Only the No-Action Alternative would reduce or avoid the cumulative impact on air quality.

A summary of each alternative addressed in the Final EIR is provided below. The purpose of this summary is to illustrate how each alternative differs from the project, whether or not each alternative can avoid or lessen the unmitigated impact, and if so, what "specific, economic, social, or other considerations" make the alternative infeasible. With the exception of the No-Action Alternative, Alternative G, the alternatives would contribute substantial traffic to one or two intersections and would therefore also contribute a significant impact to cumulative air quality impacts. Alternative A is the proposed project.

Alternative B

Alternative B represents an additional 250,000 SF of commercial office and 1.4 acres less open space than the proposed project, totalling 3,500,000 SF of mixed uses (including 300,000 SF of above-grade parking). Alternative B would also result in a significant unmitigated impact on cumulative air quality. Although this alternative meets the basic project objectives, it does not avoid this impact and is not environmentally superior to the proposed project.

Alternative C

Alternative C proposes rehabilitation of existing Navy buildings and additional development totalling 2,470,000 SF of mixed uses (including 225,000 SF of above-grade parking). The open space and museum proposed by the project would not be provided, nor would commercial office be developed. Although Alternative C meets the basic project objectives, it would have several unmitigated impacts related to planning in addition to unmitigated cumulative air quality impacts, so it is environmentally inferior to the project.

Alternative D

Alternative D would require private development on the Navy Broadway Complex site to generate sufficient revenue for acquisition and use of a second site. This alternative would be developed with 2,915,000 SF of mixed uses, including approximately 20,000 SF of Navy offices, at the Navy Broadway Complex, and approximately 980,000 SF of Navy offices on a site in the eastern area of downtown San Diego. Proposed uses on the Navy Broadway

Complex would be similar to Alternative B in intensity and layout--with 0.5 acre of open space--but additional commercial office and hotel uses would be developed in place of Navy offices to meet project financial objectives. This alternative meets the basic project objectives. However, Alternative D would also result in a significant unmitigated impact on cumulative air quality and, therefore, is infeasible as a means to avoid this impact. Alternative D is not environmentally superior to the proposed project.

Alternative E

Alternative E would include construction of 1 million SF of Navy offices on the Navy Broadway Complex site and no private development. Construction would be taxpayer-financed congressionally funded and would primarily involve the rehabilitation of the two largest buildings on the property, and construction of one new building. No open space would be provided. Although this alternative provides one million SF of Navy offices, it is infeasible because it does not meet the basic project objectives of providing the Navy offices at a reduced cost to taxpayers; it relies on direct Federal appropriation of tax dollars to totally finance the project. Although this alternative would have less of an effect on cumulative air quality than the proposed project, the impact would still be significant. Furthermore, Alternative E would have additional impacts related to planning (similar to Alternative C) and thus would be environmentally inferior to the project.

Alternative F

Alternative F would be similar to the project and would be developed with 3,315,000 SF of mixed uses (including 365,000 SF of above-grade parking), but includes no development on the most northern of the four blocks on the site and 1.4 more acres of open space. Development on the other three blocks of the site would be intensified (compared with the project), and up to 500-foot-tall buildings would be built. Although local government financial assistance would be needed for certain infrastructure improvements, this alternative meets the basic objectives of the project. Alternative F would not avoid unmitigated significant cumulative air quality impacts and would result in unmitigated aesthetics impacts as well, so it is environmentally inferior to the proposed project.

Alternative G

Alternative G is the No-Action Alternative. No new development would occur on the Navy Broadway Complex and existing uses would be retained. No unmitigated significant impacts would result. This alternative would avoid a significant cumulative impact on air quality. This alternative is infeasible because it does not meet the objective of accommodating the demand for Navy offices in a central location.

B. FINAL MEIR

As described in Item IV of Attachment A of Agency Resolution Nol 2081 and City Council Resolution 279875 certifying the Final MEIR and incorporated by reference.

1. With respect to significant traffic circulation and traffic-related land use impacts:

Even with implementation of the identified mitigations, the following significant traffic impacts would occur: level of service F on Harbor Drive and Broadway, SR-163 and I-5 and on eight freeway ramps providing access to downtown from SR-163 and I-5. Further mitigation would require a significant reduction in the scale or volume of future development in the Project Area. The Final MEIR assessed the effect of alternatives which would provide for: development of remote parking in the Project Area; implementing reversible lanes on Harbor Drive; decreased intensity of development at the waterfront; a no project alternative; and a reduced density alternative.

The Final MEIR assessed the effect of alternatives which would provide for: development of remote parking in the Project area; implementing reversible lanes on Harbor Drive; decreased intensity of development at the waterfront; no project alternative; and a reduced density alternative.

The scale or volume of the development in the Project Area could be reduced by reducing development at the waterfront and by both the reduced-and no-project alternatives. However, reduction of the intensity at the waterfront is not within the jurisdiction of The City of San Diego. Reduction of intensity through the no project and reduced density alternatives would be economically infeasible.

The analysis contained in the Final MEIR finds that anticipated Central City development with no redevelopment plan would result in traffic and related noise increasing, and corresponding air quality decreasing over time, with none of the coordinated planning and mitigation mechanisms available with the use of a community or redevelopment plan. The demand for public facilities and services would continue without the

resources of redevelopment available. Furthermore, the loss of a coordinated plan for redevelopment would result in an underutilization of land within the urban core, thereby encouraging further development pressure in outlying areas, with the attendant potential significant impacts on regional traffic, air quality, energy consumption, public services, loss of open space and potential loss of agricultural land. The no project alternative would not encourage the objectives and goals of the Redevelopment Plan, and other related documents, with respect to elimination of urban blight and incompatible land uses within the urban core. Physical, economic and social conditions would not be improved and could worsen placing a greater drain on city and county resources. The no project alternative would further endanger the City's ability to promote the identified goals.

2. With respect to significant air quality impacts:

Even with implementation of the identified mitigations, significant air quality impacts associated with CO occurrence on all street segments, ramps, and freeway segments that operate at an LOS of D or below, would occur even after traffic mitigations are implemented. Further mitigation would require a significant reduction in the scale or volume of future development in the Project Area. The MEIR assessed the effect of alternatives which would provide for decreased intensity of development; and the no project alternative. The scale or volume of development in the Project Area could be reduced by both of the alternatives. The social, economic and other considerations which make these alternatives infeasible are the same as those described under paragraph above.

V. The following discussion explains the benefits of the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement which outweigh the significant environmental effects of the redevelopment of the Navy Broadway Complex, as provided for in the proposed Development Agreement, which cannot be avoided or substantially lessened.

A. The proposed project would provide a 1.9-acre area for development by the City of San Diego of public open space at the foot of Broadway adjacent to the waterfront. There is the possibility that this area could be combined with adjacent area under control of the City and the San Diego Unified Port District to create an up to 10-acre waterfront park. An open space area at the foot of Broadway has been long sought by the City, and is represented in a number of planning documents, including the Central Bayfront Design Principles. At least 75 percent of the linear ground level frontage of buildings

fronting the open space will be developed with retail, restaurants, and other public-oriented activities. The open space area could serve as a waterfront gateway to downtown San Diego.

In addition to the 1.9-acre open space at the foot of Broadway, pedestrian facilities and galleries would add another 3 acres of open space uses to the site. In all, the project will enhance pedestrian access to and use of the waterfront, and will be a substantial community benefit.

- B. Currently there is no access along E Street, F Street, or the extension of G Street through the Navy Broadway Complex. Pedestrian access to the waterfront from the downtown core and the Marina residential area is thus precluded along these streets. These streets would be opened and improved with wide pedestrian ways to provide enhanced pedestrian access to the waterfront. The extension of G Street will be improved to provide 60 feet of pedestrian access within a 120-foot right-of-way. This will provide substantially improved access between the G Street Mole and the Marina residential area. E and F streets will both be improved with approximately 35 feet of pedestrian access within a 75-foot right-of-way.
- C. The major buildings on the site are industrial in appearance. The site, while well maintained, exhibits minimal architectural variation. The project will have architectural excellence, designed to step down from the downtown core to the waterfront. Towers will be designed to minimize view obstructions from inland areas, and to create a well-composed skyline compatible with existing and planned development. Low-rise elements will be designed to create interest and variety. Street level elements will be designed to provide a pedestrian scale. Fences and buildings that block views to the waterfront along G Street will be removed. High quality streetscaping and landscaping will be established to promote a comfortable and enhanced pedestrian environment. Enhanced pedestrian walkways will be provided along Pacific highway, Broadway, and Harbor Drive.
- D. Up to 55,000 SF of unfinished space shall be provided for a community-sponsored group to develop a museum, with a likely orientation toward showcasing the maritime heritage of the City and the historic significance of this area of the waterfront. The museum would be designed to provide principle access to the open space area, to integrate project design elements and further emphasize the pedestrian environment created by the

project.

- E. The Central Bayfront Design Principles were adopted to help guide development among the several jurisdictions and property owners located along the Central Bayfront. The design principles were incorporated into the preliminary Centre City San Diego Community Plan and the Navy Broadway Complex Project. The development agreement between the City and the Navy will provide assurance that redevelopment of this area, over which the City has no authority, will be compatible with other development existing and planned for the area. The Progress Guide and General Plan contains an objective for the central urbanized area of the City of "attracting the most intensive and varied land use including office administrative, financial, residential, and entertainment, and strengthening the viability of the central areas through renewal, redevelopment, and new construction."
- F. The waterfront area in the project vicinity is heavily used by residents, employees, and visitors. The Navy Broadway Complex, in its current configuration, does not enhance the area for waterfront users. The project as proposed will enhance San Diego's waterfront. The open space area at the foot of Broadway will provide the opportunity to create a component of a waterfront gateway to downtown San Diego. Pedestrian access to the waterfront will be substantially increased by the provision of access ways through the site, and by providing pedestrian amenities along the various walkways adjacent to and through the site. The waterfront museum will also provide a substantially beneficial use complimentary to the waterfront.
- G. The project would provide approximately 10,300 permanent job opportunities at project buildout. Nearly 6,700 of these jobs would be with Navy personnel already in the region but more than 4,100 new employment opportunities would be created. This would enhance the economic base of downtown San Diego.
- H. The Navy Broadway Complex does not currently provide tax revenues to the City of San Diego. After redevelopment, the project site would generate property taxes, sales taxes, and transient occupancy taxes to the City of San Diego. It is projected that the project would return \$253,197,000 net in revenues to the City of San Diego over the next 30 years. The assumptions and methodology used to derive this are described in detail on pages 4-139 through 4-143 of the draft EIS. This is a substantial benefit of the project, and provides revenue

to the City from a site that has not previously produced any public revenues.

I. FINAL MEIR

As described in Item V of Attachment A of Agency Resolution No. 2081 and City Council Resolution No. 279875 certifying the Final MEIR and incorporated by reference.

Significant unavoidable traffic and circulation and traffic-related land use impact is partially offset by the benefits of implementing the Redevelopment Plan which provides a synergistic mix of land uses that will reduce the number and length of regional trips as well as the number of trips made into downtown.

Significant unavoidable air quality impact is partially offset by the implementation of an aggressive transit improvement program serving downtown.

The Community Plan and related documents will allow the use of redevelopment methods to eliminate blight and to encourage development of new buildings and businesses which conform to the land use goals stated in the Centre City Community Plan. The Plan will improve administration of the existing redevelopment projects as well as facilitate coordinated planning and infrastructure improvements between multiple jurisdictions for the benefit of the entire area, including the improvements on and adjacent to property owned by the Unified Port District, the federal government, and the Metropolitan Transit Development Board.

Implementation of the Redevelopment Plan also partially offsets unavoidable traffic and circulation impacts by providing for transit, pedestrian, street freeway ramp and parking improvements that would not otherwise be made due to a lack of public resources and coordination with multiple jurisdictions.

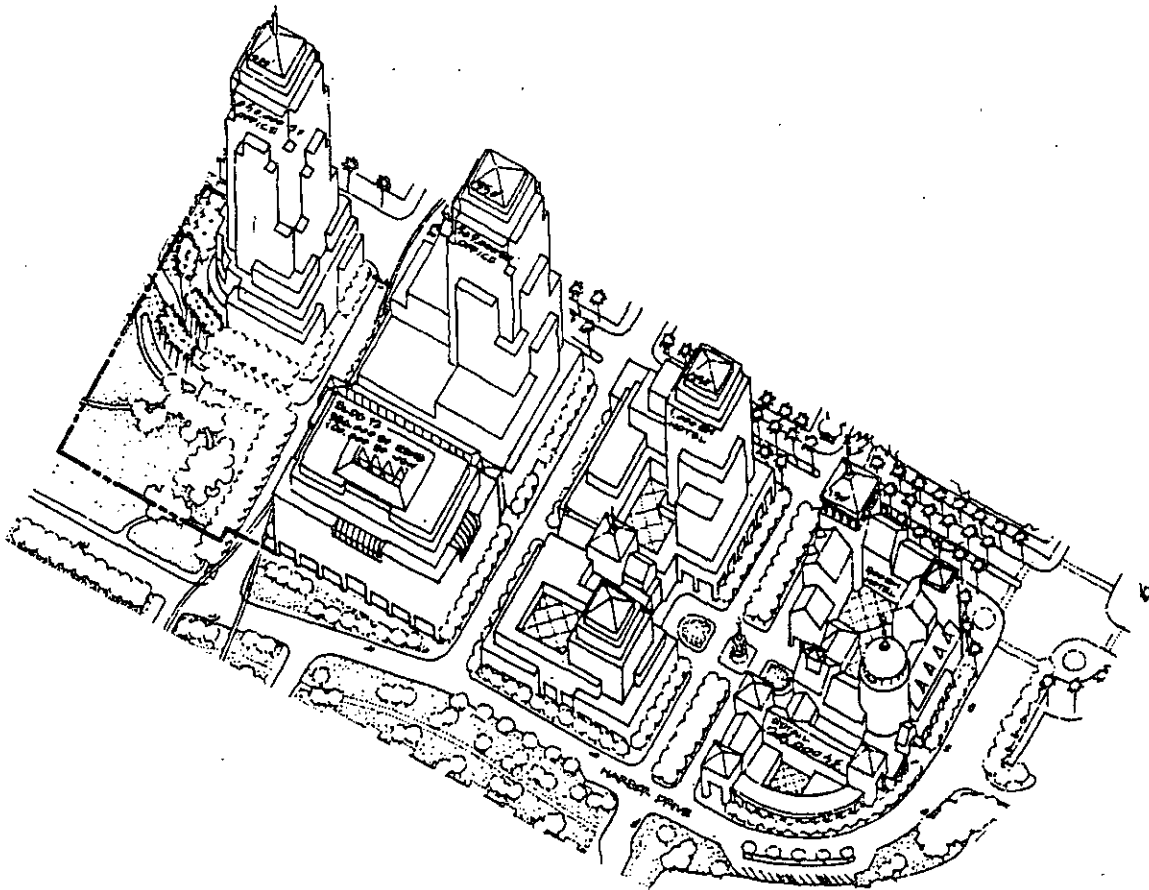
Public involvement through the redevelopment process would stimulate private reinvestment in the area and aid the neighborhoods in effectively competing in the city-wide demand for needed public improvements and services. The economic environment in and around the Redevelopment Project Area and Planning Area will thus be revitalized through new development, including continued increases to the property tax base and resultant increases to the tax increment available for redevelopment. Redevelopment will bring residents, employees and visitors into

downtown, with associated increases in spending and consumption of services. Properties adjacent to the redeveloped areas will have the incentive to improve their facilities to capitalize on the increase in activity downtown.



City of San Diego

Final Environmental Impact Report
Navy Broadway Complex Project
San Diego, California



October 1990

R280915

**FINAL
ENVIRONMENTAL IMPACT REPORT
FOR THE
NAVY BROADWAY COMPLEX PROJECT**

City of San Diego
City Administration Building
202 "C" Street
San Diego, California 92101

Contact: Maureen A. Stapleton
Deputy City Manager

October 1990

PREFACE TO THE FINAL EIR

The National Defense Authorization Act for fiscal year 1987, Public Law 99-661, authorized the Navy Broadway Complex project. The Navy and City of San Diego executed a memorandum of understanding (MOU) agreeing to enter into a development agreement, including a development plan and urban design guidelines for the project.

Because both the Navy and the City of San Diego must approve the development agreement, both an environmental impact statement (EIS) prepared in accordance with the National Environmental Policy Act (NEPA) and an environmental impact report (EIR) prepared in accordance with the California Environmental Quality Act (CEQA) have been completed and address the potential environmental impacts of the proposed project.

This document is the Final EIR, for which the City of San Diego is the lead agency. In accordance with Section 21083.5 of CEQA, an EIS may be submitted in lieu of an EIR, to the extent that the EIS complies with CEQA and the State CEQA Guidelines. According to Section 21083.7 of CEQA, when a project requires preparation of both an EIS (in accordance with NEPA) and an EIR (in accordance with CEQA), "the lead agency shall, whenever possible, use the EIS as such EIR as provided in Section 21083.5." As provided by Section 15150 of the State CEQA Guidelines, an EIR "may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public."

The Final EIS was prepared to fully comply with the provisions of both NEPA and CEQA, and contains all discussions required by each act. The Final EIS is being circulated concurrently with and to the same agencies and members of the public as the Final EIR. Please see the Executive Summary of the Final EIS for a general description of the project and the major environmental issues associated with its implementation.

Draft Environmental Impact Report
(Original Text)

**DRAFT
ENVIRONMENTAL IMPACT REPORT
FOR THE
NAVY BROADWAY COMPLEX PROJECT**

City of San Diego
City Administration Building
202 "C" Street
San Diego, California 92101

Contact: Maureen A. Stapleton
Deputy City Manager

April 1990

PREFACE TO THE DRAFT EIR

The legislation authorizing the Navy Broadway Complex project is the National Defense Authorization Act for fiscal year 1987; Public Law 99-661. The Navy and City of San Diego executed a Memorandum of Understanding (MOU) agreeing to enter into a development agreement, which will include a development plan and urban design guidelines for the project.

Because both the Navy and the City of San Diego must approve the development agreement, both an environmental impact statement (EIS) in accordance with the National Environmental Policy Act (NEPA) and an environmental impact report (EIR) in accordance with the California Environmental Quality Act (CEQA) are being prepared to address the potential environmental impacts of the proposed project.

This document is the EIR, for which the City of San Diego is the lead agency. In accordance with Section 21083.5 of CEQA, an EIS may be submitted in lieu of an EIR, to the extent that the EIS complies with CEQA and the State CEQA Guidelines. According to Section 21083.7 of CEQA, when a project requires preparation of both an EIS (in accordance with NEPA) and an EIR (in accordance with CEQA), "the lead agency shall, whenever possible, use the EIS as such EIR as provided in Section 21083.5."

The EIS was prepared to fully comply with the provisions of both NEPA and CEQA, and contains all discussions required by each act. As provided by Section 15150 of the State CEQA Guidelines, an EIR "may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public." This EIR incorporates by reference the EIS for the Navy Broadway Complex project. The EIS fully complies with CEQA and the State CEQA Guidelines, so the EIS shall also serve as the EIR for this project. The EIS is being circulated concurrently with and to the same agencies and members of the public as the EIR. Therefore, a summary of the contents of the EIS is not necessary within this EIR. The address to submit comments and request additional information is provided below.

CONTACT FOR INFORMATION AND SEND COMMENTS TO:

Officer in Charge
Western Division Naval Facilities Engineering Command Detachment
Broadway Complex
555 West Beech Street, Suite 101
San Diego, California 92101-2937
(619) 532-3291

COMMENTS ON THE DRAFT EIR

Written comments must be received at the above address by:

JUN 4 1990

CONCLUSIONS TO EIR:

An Environmental Impact Statement (EIS) was prepared to address the environmental impacts of each of the proposed alternatives. This EIR incorporates the EIS by reference. The EIS addressed land use and applicable plans, transportation and circulation, aesthetics and viewshed, public services and utilities, socioeconomics, the physical environment, biological resources, air quality, noise, cultural resources, public health and safety, and energy and conservation.

The preferred alternative, Alternative A, would include a 1.9-acre open space area, a museum, and specific design guidelines consistent with existing plans. Beneficial impacts to land use, viewsheds, recreational facilities, and socioeconomics would result from this alternative.

The proposed alternatives would include transportation demand management measures that would reduce the potential air quality impacts of the project. According to the California Air Resources Board, incorporation of these measures would demonstrate consistency with the State Implementation Plan.

The Regional Air Quality Strategy establishes a goal of maintaining a Level of Service (LOS) C or better to reduce idling of times and vehicular emissions. Cumulative development in the project vicinity would create congestion (Level of Service D or below) at six intersections. The proposed project would contribute a substantial increment to this congestion at one to two of these intersections. City of San Diego standards provide that this incremental contribution to the region's non-attainment of ozone and carbon monoxide standards is a cumulatively significant unmitigated impact.

RECOMMENDED MITIGATION OR ALTERNATIVES FOR SIGNIFICANT UNMITIGATED IMPACTS:

The No Project alternative, which would retain the site in its current condition, would eliminate impacts to air quality and traffic circulation. Other alternatives considered in the EIS would have similar impacts to the proposed project. These alternatives would have a cumulatively significant air quality impact.

MITIGATION MEASURES INCORPORATED INTO THE PROJECT:

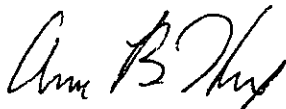
In order to mitigate adverse circulation impacts, intersection improvements would be made in phases timed to construction on the various blocks of the project site. The improvements include the addition of turn lanes at the Broadway/Pacific Highway intersection and the signalization of Harbor Drive north of Broadway and the Pacific Highway/Harbor Drive intersection.

These measures would be implemented by the City of San Diego according to the proposed Development Agreement. Improvements to the Pacific Highway/Grape Street and Broadway/Front Street intersections are also planned by the City as recommended in the Centre City Transportation Action Plan. In addition, "E", "F", and "G" Streets would be extended through the project site. These measures would improve the levels of service (LOS) at three intersections from LOS E-F to LOS D. Other intersections would not be significantly adversely affected by the proposed project.

A Transportation Demand Management (TDM) program would be proposed for the project to reduce peak hour traffic impacts. TDM measures include the provision of reserved carpool spaces and encouraging transit use by accommodating only 80 percent of parking demand on site. Other measures could include the provision of bicycle lockers and transit information.

Operation of several intersections at LOS D would typically be considered a significant traffic impact. However, since the project site is located within Centre City where a densification of uses is necessary to support alternative commute modes, the project is not considered to have a significant traffic impact, from an operational standpoint, after the implementation of the above mitigation measures.

Potentially significant impacts to cultural resources associated with modification or removal of Buildings 1 and 12 would be mitigated by compliance with measures determined through consultation with the State Historic Preservation Officer.



Ann B. Hix, Principal Planner
City Planning Department

NOTICE OF PREPARATION (NOP) FOR A
CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)
DRAFT ENVIRONMENTAL IMPACT REPORT

LEAD AGENCY:

The City of San Diego, California

PROPOSED ACTION:

The Department of the Navy, in coordination with the City of San Diego, is proposing to redevelop its land known as the Navy Broadway Complex. The project site is located on approximately sixteen acres in downtown San Diego adjacent to the San Diego Bay waterfront and consists of eight city blocks that are bounded by Harbor Drive on the west, Market Street on the south, Pacific Highway on the east, and Broadway on the north (see Exhibits 1 and 2). The site is currently improved with a series of sixteen miscellaneous office and warehouse buildings containing in excess of one million square feet of gross floor area. The buildings were constructed between 1922 and 1945.

The Navy is proposing to consolidate in modern facilities the general regional administrative activities of the naval shore establishment in the San Diego area. These facilities are to be central to the San Diego naval commands, the population of the San Diego area and regional transportation systems. The Navy's objective is to redevelop this site through a public/private partnership designed to meet the Navy's regional administrative office space needs in a manner that will compliment San Diego's bayfront redevelopment. Approximately one million square feet of Navy office space is contemplated to be developed on the site by a private developer(s) for use by the Navy. Additional mixed-use (e.g. office, hotel, specialty retail) private development on the site will be allowed which is intended to offset the cost of the Navy-occupied space thereby reducing cost to the taxpayer.

A conceptual master plan and urban design guidelines will be prepared in coordination with the San Diego community through the City of San Diego to guide the development of the site. It is proposed that the Navy and the City will enter into a development agreement as the mechanism for approval and control of the site's development.

ENVIRONMENTAL CONSIDERATIONS

Prior to entering into such a development agreement, the City of San Diego is required to prepare an Environmental Impact Report (EIR) in compliance with the CEQA. The Navy will also be preparing an Environmental Impact Statement (EIS) for its proposed actions in compliance with the National Environmental Policy Act (NEPA). Because of issues common to both and to facilitate administration, joint hearings and meetings will be conducted for the NEPA and CEQA processes.

The EIR will be a full scope document that will cover all matters of potential environmental concern (an initial study is not attached to this NOP). The environmental analysis will address, but not be limited to, traffic and circulation, land use and planning, waterfront access, aesthetics and view

corridors, public services and utilities, socioeconomics, geology and seismicity, extractable resources, hydrology and drainage, biology, endangered species and critical habitat, air quality, noise, cultural resources, coastal zone management, public health and safety, and energy conservation.

Alternatives that are being considered include variations of private and Navy development on the Broadway Complex site, Navy-only development of the site, development of an alternative site in downtown San Diego, and no action.

COMMENTS ON THE SCOPE OF THE EIR:

The City of San Diego is requesting any comments you may have regarding the scope of the environmental analysis in the EIR. Because of issues common to both the Navy's environmental review and this process and to facilitate administration, the Navy is designated to collect and disseminate questions and comments regarding this process to the City of San Diego for response. Please submit comments, in writing, to the address provided below:

Officer in Charge
Western Division
Naval Facilities Engineering Command Detachment
Broadway Complex
1220 Pacific Highway
San Diego, California 92132-5190
Attn: Captain Wayne Goodermote, CEC, USN

Questions should be addressed to the same address or telephone inquiries can be directed to Anthony Principi, General Counsel, Broadway Complex Project Office, at (619) 532-3291. Written comments must be submitted by December 16, 1988.

In addition, joint public scoping meetings will be held to receive written and oral testimony from governmental agencies and the public about issues that should be addressed in the EIS/EIR. A morning session has been scheduled for agency representatives and an evening session for members of the public. The evening session will adjourn at 11:30 P.M. or earlier, if all comments have been received. The scoping meetings will be conducted by Captain Wayne Goodermote, the Officer in Charge of the Broadway Complex Project Office. The meetings will be informal. Individual speakers will be requested to limit their statements to five minutes. Written statements will be accepted at the meetings or they may be mailed to the address given above.

Both meetings will be open to the general public at the times and locations indicated below:

Morning Session

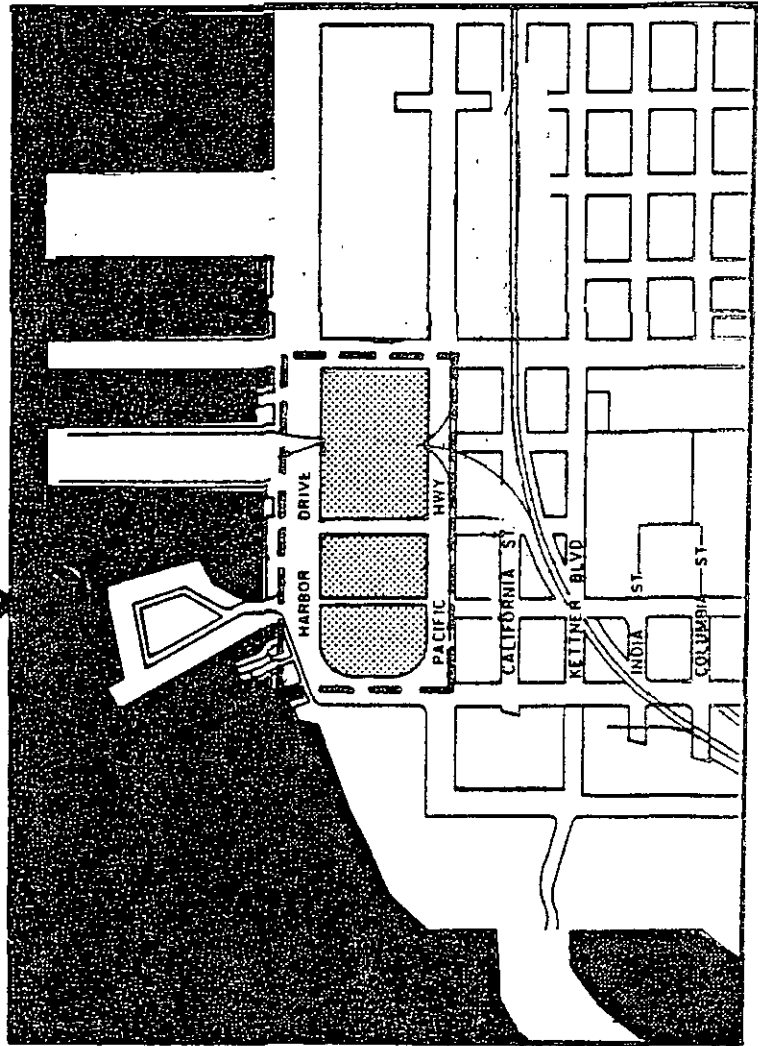
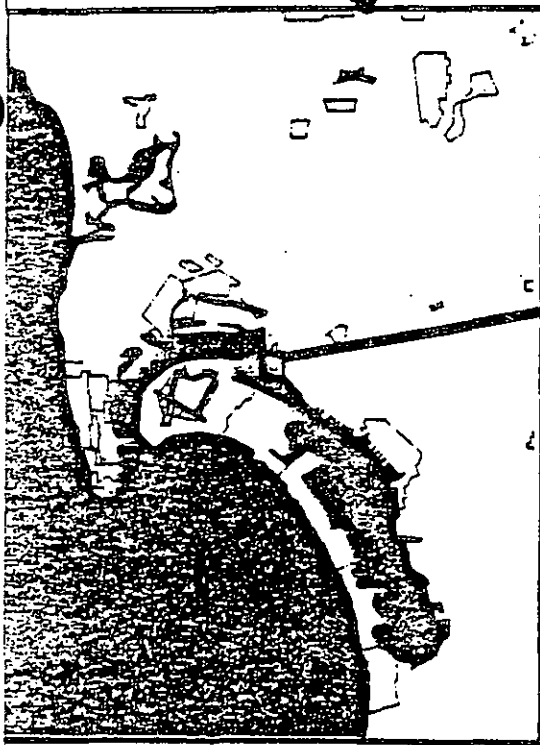
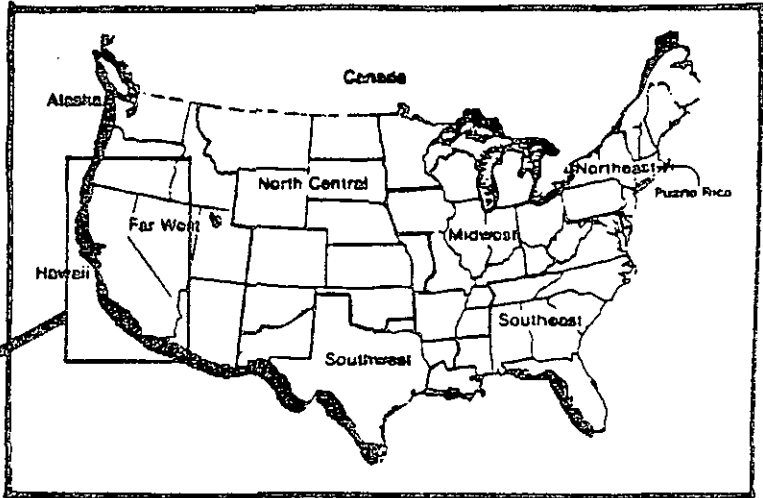
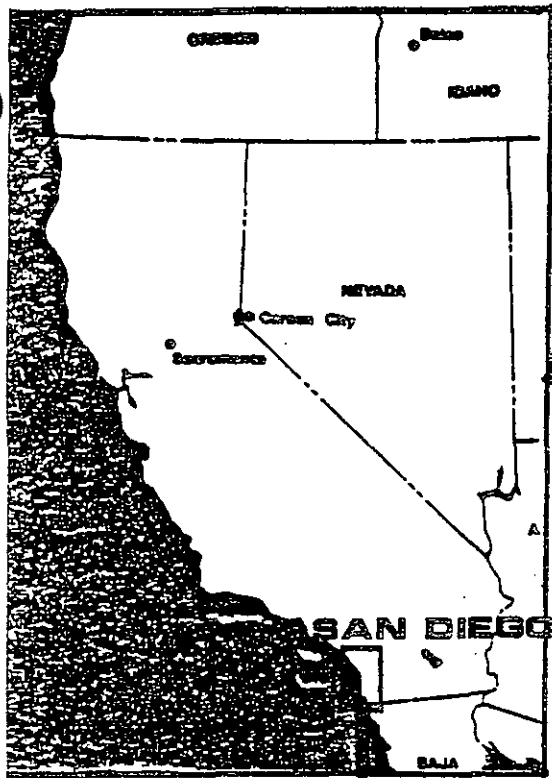
November 14, 1988 - 9:00 a.m.

City Administration Building
12th Floor
202 'C' Street
San Diego, CA 92101

Evening Session

November 14, 1988 - 7:00 p.m.

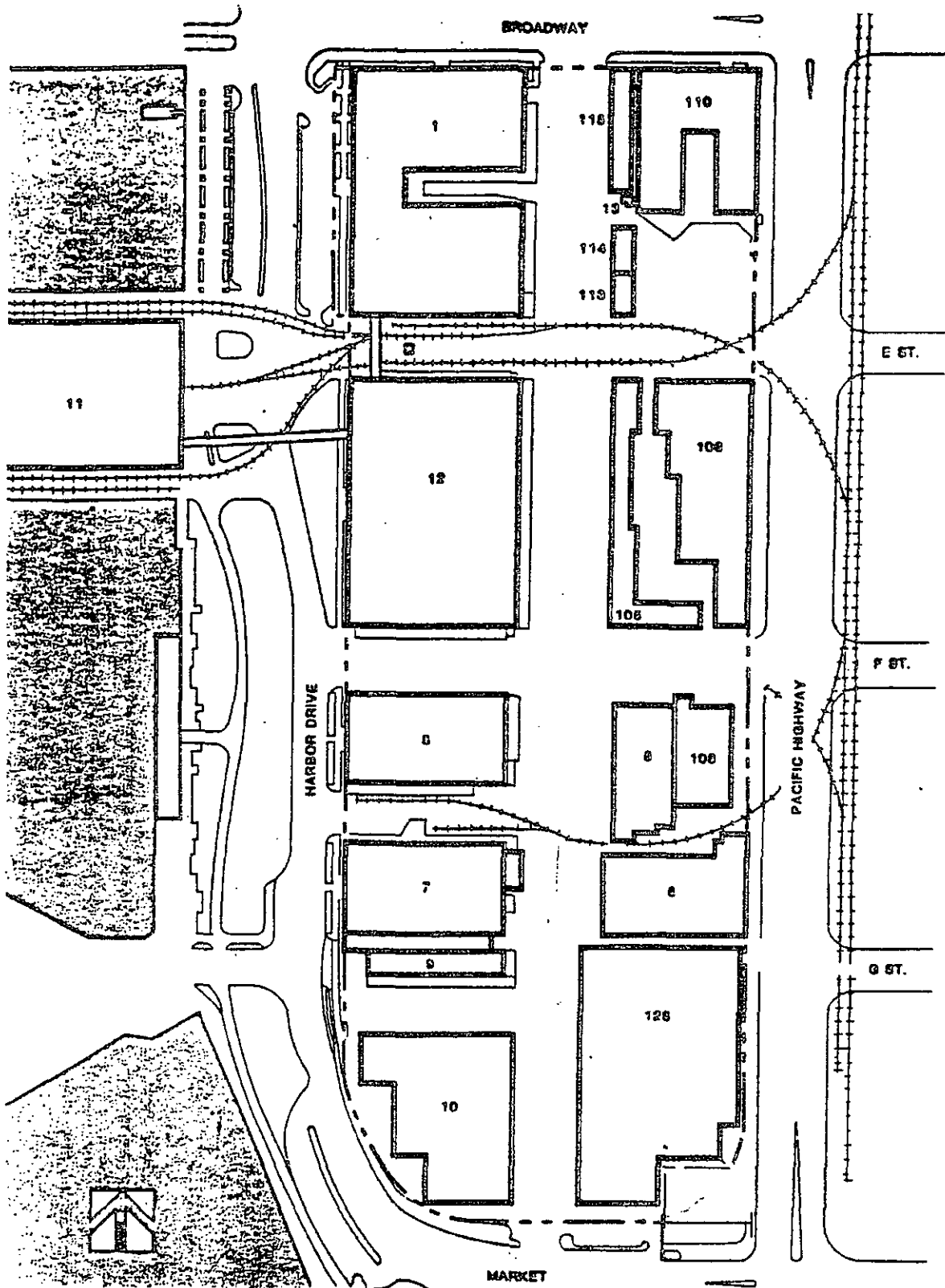
City Administration Building
12th Floor
202 'C' Street
San Diego, CA 92101



**BROADWAY COMPLEX,
SAN DIEGO, CALIFORNIA**

LOCATION MAP

EXHIBIT 1



**BROADWAY COMPLEX,
SAN DIEGO, CALIFORNIA**

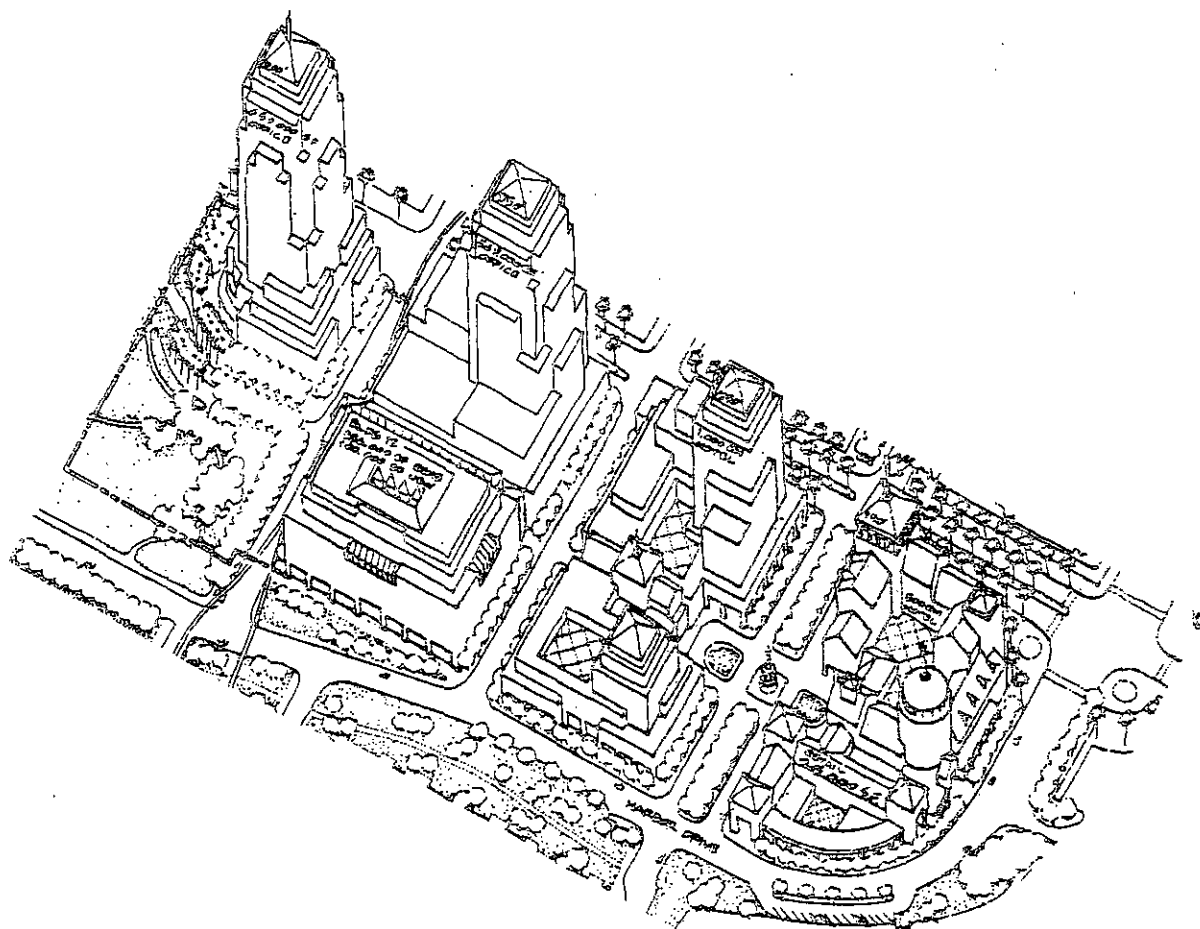
SITE MAP

EXHIBIT 2

Officer in Charge
Western Division
Naval Facilities Engineering Command
Detachment, Broadway Complex



Final Environmental Impact Statement
Navy Broadway Complex Project
San Diego, California



October 1990

P-280915

FINAL
ENVIRONMENTAL IMPACT STATEMENT
FOR THE
NAVY BROADWAY COMPLEX PROJECT

Western Division Naval Facilities Engineering Command Detachment
Broadway Complex
555 West Beach Street, Suite 101
San Diego, California 92101-2937

October 1990

FINAL ENVIRONMENTAL IMPACT STATEMENT (EIS)

U.S. DEPARTMENT OF DEFENSE DEPARTMENT OF THE NAVY

Pursuant to Section 102 of the National Environmental Policy Act of 1969, 40 CFR 1500-1508, and OPNAV Instruction 5090.1.

PROPOSED ACTION

Redevelopment of the Navy Broadway Complex, San Diego, California

LEAD AGENCY

Department of the Navy

ABSTRACT

The Navy has identified a need for administrative office space to accommodate the regional administrative activities of the San Diego naval shore establishment in modern facilities at a site central to other Navy facilities in San Diego. The Navy Broadway Complex is centrally located on approximately 16 acres in downtown San Diego, adjacent to the San Diego waterfront. The site is proposed for redevelopment through a public/private partnership in a manner that will provide needed Navy office space and complement San Diego's bayfront while retaining support activities for the continued operation of the adjacent Navy Pier. The office space will be provided at no cost to the Navy on a portion of the site in return for a long-term ground lease of the remainder of the site to the private developer.

The Navy and the City of San Diego will enter into a development agreement as the mechanism for approval and control of the site's development with approximately 3.25 million square feet of mixed uses that include Navy and commercial offices, a museum, hotel and retail space, and public open space. Alternative A described in the Draft Environmental Impact Statement (DEIS) has been selected as the preferred alternative. The Final Environmental Impact Statement (which incorporates provisions of the DEIS as shown in the table of contents) addresses the full range of potential impacts. Beneficial impacts will occur through the improvement of physical and visual waterfront access, provision of active pedestrian areas, and improved aesthetics. Direct, project-related adverse impacts will be mitigated to a level that is less than significant. A significant unmitigated cumulative impact on air quality will occur. The project will be consistent with local plans for the Central Bayfront and the Centre City, as presented in the Central Bayfront Design Principles and the Centre City San Diego Community Plan.

CONTACT FOR INFORMATION AND SEND COMMENTS TO:

W. M. Robinson, Jr., Executive Director
Western Division Naval Facilities Engineering Command Detachment
Broadway Complex
555 West Beech Street, Suite 101
San Diego, California 92101-2937
(619) 532-3291

COMMENTS ON THE FINAL EIS

Written comments must be received by: 17 DEC 1990

FINAL ENVIRONMENTAL IMPACT STATEMENT

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Other sections are found in the Draft Environmental Impact Statement, dated April 1990.

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Other sections are found in the Draft Environmental Impact Statement, dated April 1990.

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EXECUTIVE SUMMARY

PURPOSE OF AND NEED FOR ACTION

The United States Department of the Navy is the owner and/or operator of 18 administrative, support, and operational installations throughout the City of San Diego area. One such installation is known as the Navy Broadway Complex, which primarily contains administrative and warehouse facilities, and is the location of the Commander, Naval Base, San Diego; the Naval Supply Center, San Diego; and several other Department of Navy activities. The Navy Broadway Complex is centrally located to the other Navy installations on approximately 15.6 acres in downtown San Diego near the waterfront. The site currently houses 405,753 square feet (SF) of office, 179,616 SF of industrial/warehouse buildings, and 421,660 SF of industrial uses for the Navy with a total 1,007,029 SF of development. Although outside of the boundaries of the proposed project, the adjacent Navy Pier is supported by personnel at the Navy Broadway Complex and is part of the complex.

The Naval Supply Center initiated long range plans in 1979 to move much of the warehousing from the Navy Broadway Complex site to new, modern facilities located at existing naval operational bases in the San Diego region. Subsequent to this, a regional study of Navy administrative and facility requirements was conducted. The study reaffirmed that the Navy Broadway Complex with the Navy Pier was essential for national security purposes. The Navy Broadway Complex was determined to be the most suitable site for Navy regional administrative offices because of its central location in relation to other Navy installations, and its proximity to several major regional transportation facilities, including light rail transit lines, a railroad, several bus lines, and an extensive freeway complex.

Redevelopment of the Navy Broadway Complex, with continued operation of the adjacent Navy Pier, was approved by the Chief of Naval Operations in 1983. A need for up to 1 million SF of upgraded office space has since been identified to accommodate Navy administrative personnel.

The typical means by which construction of Navy offices, or other military facilities, is funded is through Congressionally approved Military Construction (MILCON) appropriations, which are taxpayer-funded and Congressionally approved. However, Congress endorsed, through Public Law (P.L.) 99-661, a concept proposed by Navy planners and community groups by which the site would be developed at reduced cost to the taxpayers through a public/private venture. P.L. 99-661 was a component of the National Defense Authorization Act of 1987.

The legislation (and related Office of Management and Budget Guidelines) allows the Secretary of the Navy to enter into long-term leases of portions of the Navy Broadway Complex in consideration for the development of the needed Navy office space on the site at no cost to the Navy.

The Navy and the City of San Diego entered into a Memorandum of Understanding (MOU) on June 1, 1987 to guide the planning and approval process for redevelopment of the Navy Broadway Complex. The MOU specifies that the Navy, in consultation with the City of San Diego, will prepare a development plan and urban design guidelines that will define the nature of development that will occur on the Navy Broadway Complex. The development plan and urban design guidelines would become part of a development agreement between the Navy and the City of San Diego.

PROPOSED ACTION

The proposed action is described as Alternative A in the Draft Environmental Impact Statement. In accordance with this alternative, the Department of the Navy proposes to redevelop the Navy Broadway Complex with 3,250,000 SF of mixed uses (including 300,000 SF of above-grade parking). The project is intended to provide a balance between developed and open space uses on the site, while meeting the Navy's office space objective. Designed to maximize community objectives, the project would provide for a number of beneficial uses. Such uses are described below.

- A 1.9-acre public open space area would be provided for community use at the foot of Broadway, adjacent to the waterfront. This area could potentially be combined with adjacent properties to create an even larger open space that could be considered a new waterfront gateway to downtown San Diego.
- Up to 55,000 SF of space for a museum, which would be completed and operated by a community-sponsored organization.
- Pedestrian and vehicular access would be developed along E, F, and G Streets and would be upgraded on all streets surrounding the site so that access between the downtown core and the waterfront would be improved. Access along the waterfront would also be improved by providing a midblock pedestrian passage parallel to the bayfront.
- View corridors along E, F, and G streets would be opened to the waterfront.
- Ground-level retail would be provided to encourage pedestrian use of the area.

The proposed mix of uses for the project is shown below. Depending on market conditions, the square footage may be modified, with the overall square footage not to exceed 3,250,000 SF.

- Navy office: 1 million SF
- Museum: 55,000 SF
- Commercial office: 650,000 SF
- Hotel: 1,220,000 SF (1,500 rooms)
- Retail: 25,000 SF
- Above-grade parking: 300,000 SF (800 spaces)
- Total parking spaces: 3,105

The project would be designed so that the tallest buildings are in the northeastern portion of the site closest to downtown San Diego, while shorter structures step down to the waterfront to the west and south. The tallest building would be up to 400 feet in height, with the other buildings ranging from 100 to 350 feet. Buildings would have a slender design to provide open view corridors.

COORDINATION

During preparation of the draft and final EIS, affected agencies were contacted for technical information and elaboration of agency concerns. Mitigation measures were developed in coordination with such agencies. Additional coordination with some of the listed agencies may be required during project implementation:

1. City of San Diego (traffic and other infrastructure improvements)
2. California State Historic Preservation Officer (cultural resources)
3. National Park Service (cultural resources)
4. California Regional Water Quality Control Board (temporary construction dewatering)
5. Federal Aviation Administration (construction within a Federal Aviation Regulation imaginary surface)

A complete listing of all agencies consulted during preparation of the EIS is contained in Section 12. A complete listing of all agencies and individuals who commented on the draft EIS is included in Appendix F.

MAJOR ENVIRONMENTAL ISSUES

The draft EIS disclosed the potential environmental impacts of the proposed action and provided mitigation measures to reduce the significant impacts. The draft EIS was based on environmental issues identified by the Navy and through an early consultation process, which included the October 18, 1988 circulation of a Notice of Intent to public agencies and interested individuals, and the November 14, 1988 public scoping meeting. The draft EIS was circulated for public comments on April 13, 1990, and a public hearing was held May 16, 1990. The public review period was closed June 4, 1990. Comments on the draft EIS and responses thereto are included in Appendix F. Complete environmental documentation required by law is contained in the draft EIS and the final EIS, which need to be read together to obtain a comprehensive understanding of the project and its environmental consequences. The following discussion summarizes the major findings of the EIS.

Land Use and Applicable Plans: The project is compatible with surrounding land uses and provides active pedestrian uses such as an open space area (1.9 acres), pedestrian corridors, and space for a waterfront museum. It would substantially improve waterfront access by extending E, F, and G streets through the site to the waterfront and providing pedestrian-oriented improvements. The project is consistent with public access, coastal development, and visual resource policies of the California Coastal Act. It is also consistent with the general principles adopted for development of properties in San Diego's Central Bayfront, as well as with the preliminary Centre City San Diego Community Plan. In addition, the project creates a strong linkage between downtown and the waterfront and implements the City-adopted goals of providing open space at the foot of Broadway and waterfront-oriented land uses.

Transportation/Circulation: Development of Phase I of the project would not substantially affect any intersections. Long-term project operations would adversely affect the operation of several intersections in the project vicinity. Affected intersections include Grape/Pacific, Broadway/Harbor, Broadway/Pacific, and Broadway/Front. Intersection improvements associated with the project or programmed by the City of San Diego would reduce impacts at each intersection to less than significant. In addition to the listed intersections, long-term project traffic would significantly contribute to overcapacity conditions along Pacific Highway south of Broadway and First Avenue south of Ash. Planned improvements along First Avenue would reduce to less

than significant expected impacts along the segment south of Ash. With implementation of a Travel Demand Management program, sufficient parking would be provided to meet parking demands onsite.

Aesthetics and Viewsheds: Viewsheds would be altered by replacing or upgrading the existing buildings. The project would be designed to be visually compatible with the surrounding viewshed and would beneficially affect viewsheds by opening up and/or protecting view corridors along Broadway and E, F, and G streets.

Geology and Seismicity: The site is considered to generally lie within the Rose Canyon fault zone. The project could be subjected to severe seismic shaking, with a potential onsite liquefaction hazard. Design measures to withstand geologic hazards would reduce adverse effects to less than significant.

Biological Resources: Terrestrial biological resources are not present because the site is already developed, so no impacts would occur. No substantial shadows would be cast over the bayfront during the time of the day when the sun is direct (after 9:30 a.m., even during the winter season), thus avoiding any potential significant effects to marine life. Mirrored glass would be prohibited in buildings, reducing the possibility for bird strikes.

Air Quality: Substantial new vehicle trips would be generated. An extensive Travel Demand Management Program would be implemented to substantially reduce the use of single-occupancy vehicles. The air quality management plan and State Implementation Plan are being updated to reflect current growth conditions. The primary means to reduce emissions will be a reduction in single-occupancy vehicles. The project would be compatible. However, the San Diego Air Basin has not attained standards for ozone and carbon monoxide. The project would contribute substantially to congestion at one intersection (Pacific/Grape). Because of the air basin's non-attainment status, this would result in a significant contribution to cumulative regional air quality impacts.

Cultural Resources: The site is underlain with artifacts from waterfront development between the 1880s and 1910s. These materials are buried beneath the dredged fill placed onsite to create dry land for more development. The archaeology, while containing many artifacts, lacks stratigraphic integrity and context, and is therefore unlikely to contribute important information about San Diego's early history. The archaeological resources do not appear to qualify for inclusion in the National Register of Historic Places. This has been confirmed through consultation with the California State Historic Preservation Officer and the Advisory Council on Historic Preservation. Excavation for footings and other below-grade construction would destroy any archaeology that might exist but this would not result in the loss of a significant resource. Should an unanticipated significant archaeological resource be discovered during project excavations, it would be evaluated and, if found to be important, would be treated in accordance with 36 CFR 800.11.

Navy Broadway Complex Buildings 1 and 12, combined with the Navy Pier (located outside the project boundaries), form a unit that represents every major period of Navy development at this location. These structures have been an architectural feature of the San Diego Harbor and skyline for nearly 50 years. As a unit, they appear to qualify for the National Register of Historic Places. Demolition or any substantial modification of these structures would constitute a significant impact. Specific mitigation has been developed in consultation with California SHPO pursuant to the regulations (36 CFR 800) for implementing Section 106 of the National Historic

Preservation Act (16 U.S.C. 470f). The Navy will record Buildings 1 and 12 in accordance with the Historic American Buildings Survey Standards prior to demolition or modification.

Public Health and Safety: Minor hazardous waste spills were located or may be located on the site. In addition, transformers that contain PCBs are located on the site although none are known to be leaking. Because the presence of hazardous waste can affect public health, this would be considered a significant impact with any of the alternatives. There are no known major hazardous waste spills or leaking underground storage tanks on the site. Remedial action to remove and properly dispose of any hazardous waste found on the site will occur. Most of the existing buildings on the site contain asbestos. A potential public health hazard would result during demolition, when asbestos fibers could become air-borne. The project would be required to comply with the Federal Clean Air Act to protect the public from exposure to asbestos.

A groundwater plume that has been contaminated with hydrocarbons is 1/3 mile (estimated) and downgradient of the Navy Broadway Complex. Groundwater quality testing at the site found no evidence of contamination. Although unlikely, temporary groundwater dewatering during subsurface construction could draw the plume toward the site. A National Pollutant Discharge Elimination System Permit covering the discharge of construction dewatering effluent was issued by the Regional Water Quality Control Board. The developer will apply for authorization to discharge under authority of that permit.

The 400-foot-high building on Block 1 would exceed non-operational imaginary height surfaces, but based on a Federal Aviation Administration (FAA) determination, would not result in a hazard to air navigation. Buildings on the easterly areas of Blocks 1, 2, and 3 would be obstruction lighted, per FAA standards.

APPENDIX F

RESPONSE TO COMMENTS
ON THE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE
NAVY BROADWAY COMPLEX PROJECT

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SECTION 1

INTRODUCTION

On April 13, 1990 the Department of the Navy and the City of San Diego distributed to public agencies and the general public the draft environmental impact statement (DEIS) and the draft environmental impact report (DEIR) for the Navy Broadway Complex project in San Diego, California. In accordance with the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA), a 45-day public review period for the documents was provided, and it ended June 4, 1990. A number of written comments were received. In addition, a public hearing was held in San Diego on May 16, 1990 to receive oral comments.

All comments on the DEIS and the DEIR, and the responses thereto, are presented in this document. Section 2 provides all the comments on the documents, and Section 3 presents responses to significant environmental points raised in the comments. A number and letter (eg., "B-3") is placed adjacent to each comment in Section 2. Each comment is keyed to a response in Section 3 using this notation.

This document, together with the DEIS, constitutes the final EIS (FEIS). Where a comment results in a change in the EIS text, a notation is made in the comment indicating that the text is hereby revised. The final EIR (FEIR), prepared in accordance with CEQA, is being circulated to the public by the City of San Diego simultaneously with this document. The final EIR incorporates by reference this document.

SECTION 2

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

2.1 LIST OF COMMENTATORS

All comments on the DEIS are listed below with the letter designation assigned for cross-referencing purposes. This list represents all comments received as of June 4, 1990. The verbatim comment letters and a verbatim transcript of the public hearing are presented in Section 2.2.

2.1.1 WRITTEN COMMENTS

- A. Robert S. Joe, United States Department of Army, Corps of Engineers, May 22, 1990
- B. Kenneth W. Holt, M.S.E.H., United States Department of Health and Human Services, May 24, 1990
- C. Montague D. Griffin, May 25, 1990
- D. Don L. Nay, Port of San Diego, May 31, 1990
- E. James T. Cheshire, State of California, Department of Transportation, June 1, 1990
- F. Michael J. Stepner, City Of San Diego, City Architect, May 31, 1990
- G. Craig Adams, June 3, 1990
- Dwight E. Sanders, State of California, State Lands Commission, June 4, 1990
- I. Harry E. Wilson, June 1, 1990
- J. Norman W. Hickey, County of San Diego Chief Administrative Office, June 1, 1990
- K. Frederick M. Marks, Citizens Coordinate for Century 3, June 4, 1990
- L. Robert P. Martinez, State of California, Office of Planning and Research, June 4, 1990
- M. Gordon F. Snow, Ph.D., State of California Resources Agency, June 4, 1990
- N. Dennis J. O'Bryant, State of California, Department of Conservation, May 24, 1990
- O. Peter M. Douglas, California Coastal Commission, June 8, 1990
- P. Max Schmidt, Centre City Development Corporation, June 13, 1990
- Q. Deanna M. Wieman, United States Environmental Protection Agency, June 15, 1990

2.1.2 ORAL COMMENTS RECEIVED AT MAY 16, 1990 PUBLIC HEARING

- HA. Colleen Cronin, National Safety Associates
- HB. Don Wood, C-3 and the Bayfront Coalition



DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 3711
LOS ANGELES, CALIFORNIA 90063-2221

May 22, 1990

00000001

REPLY TO
ATTENTION OF

Office of the Chief
Environmental Resources Branch

Mr. L.D. Misko
Director of Planning
Naval Facilities Engineering Command Detachment
Broadway Complex
555 West Beach Street, Suite 101
San Diego, California 92101-1937

Dear Mr. Misko:

We have reviewed the Draft Environmental Impact Statement from your office, and the Draft Environmental Impact Report from the City of San Diego for the Navy Broadway Complex Project, as requested in a letter from your office, dated April 13, 1990.

Work in waters of the United States might require a permit under Section 404 of the Clean Water Act or Section 10 of the Rivers and Harbors Act. Please give our Regulatory Branch documentation that clearly describes the area and extent of any proposed work in watercourses and adjacent wetlands to help us make that determination.

A-1

If the proposed project involves any Federal assistance through funding or permits, compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470f) and implementing regulations, 36 CFR 800, will be required.

A-2

Thank you for the opportunity to review and comment on this document.

Sincerely,


Robert S. Joe
Chief, Planning Division

0000000

Centers for Disease Control
Atlanta GA 30333

May 24, 1990

Officer in Charge
Western Division Naval Facilities Engineering
Command Detachment
Broadway Complex
555 West Beech Street, Suite 101
San Diego, California 92101-2937

Dear Sir:

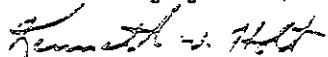
We have completed our review of the Draft Environmental Impact Statement (DEIS) for the Navy Broadway Complex Project, San Diego, California. We are responding on behalf of the U.S. Public Health Service.

We note that existing onsite contaminates, particularly asbestos and PCB's, have been investigated and does not pose imminent health threats. If any demolition occurs, the Navy will use acceptable practices in compliance with the Clean Air Act, and other Federal and State requirements to minimize potential exposures. Also, we note that several areas with questionable contamination will require further investigation, and remedial action to remove and properly dispose of any hazardous waste found onsite will occur to ensure protection of public health. We believe this DEIS has adequately addressed potential adverse impacts and appropriate mitigative measures, and we do not anticipate any significant public health impacts from the proposed action.

B-1

Thank you for the opportunity to review this DEIS. Please ensure that we are included on your mailing list to receive the Final EIS for this project and future DEIS's developed under the National Environmental Policy Act (NEPA).

Sincerely yours,


Kenneth W. Holt, M.S.E.H.
Environmental Health Scientist
Center for Environmental Health
and Injury Control

0000003

MONTAGUE D. GRIFFIN
2036 UPAS STREET
SAN DIEGO CA 92104
MAY 25, 1990

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT:
NAVY BROADWAY COMPLEX PROJECT, SAN DIEGO, CALIFORNIA

1. General Comments

None of the seven Alternatives best serves the public interest of the citizens of San Diego. All have substantial liabilities, including increased impacts on fire and police protection, traffic, circulation and parking, schools, recreation, air quality, viewscales and aesthetics, and the Bayfront overall. All are growth-inducing.

C-1

Granted the validity of the CNO's determination that the Navy requires one million square feet of Navy office space, the most appropriate alternative is for the Navy to follow the Military Construction Appropriation process, justify the development scale and costs to Congress, and fund the construction from Federal funds, construct the approved project wholly on Block 2, and lease the other three blocks of the site to the City of San Diego for purposes of Bayfront park and open space. Only this approach will truly minimize the development impacts and maximize the public benefit. The DEIR does not address the economic risk of the proposed public-private development venture process. Developing more major hotels downtown is a risky business. There is no guarantee of success. The entire project as proposed is based upon three tenuous hypotheses: (1) that private development can be undertaken within the Navy's required time frame, (2) that the private portion of the project will be financially viable, and (3) that the ultimate cost to taxpayers will be less. There is a substantial probability that the project will cost the taxpayers more, not less, as a result of the Navy's approach.

C-2

C-3

Given the opportunity, I believe most San Diegans would prefer to see a clean-cut, out-in-the-open financing for a project consisting of exactly what the Navy requires for its administrative facility on the Bayfront, no less and no more, and dedicate the remainder of its frontage for the public good. C-4

2. Specific Comments

(a) Page 1-3, Para. 1.2.1

Only an alternative such as that suggested in paragraph 1. above would provide significant downtown Bayfront open space, access, and view corridors. C-5

(b) Page 1-12, Alternative E

Alternative E is fatally marred by its exorbitant use of the entire site. It is an ill-conceived and inappropriate implementation of the correct concept for the project. C-6

(c) Page 1-12, Alternative F

Alternative F is a distant second choice for the project, but certainly, on balance, preferable to Alternative A because of the greater potential for a foot-of-Broadway park. C-7

(d) Page 4-74 et seq., Para. 4.3 Aesthetics and Viewsheds

Viewed from any aspect, the preferred Alternative A and several of the others are seriously detrimental to Bayfront aesthetics. C-8

(e) Page 4-111, Effects of Shadows

10 am and 2 pm shadowgrams do not with any realism portray the extraordinary effects of sunlight blockage by highrise buildings. One can only laugh at the unwarranted and unsupported statements within the last paragraph of page 4-111. C-9

(f) Page 4-122, Table 4.4-3

In view of the serious efforts to reduce water usage, the daily consumptive water use data should be revised downward. C-10

0000003

MONTAGUE D. GRIFFIN
BROADWAY COMPLEX

(g) Page 4-126, Para. 4.4.7

This section should identify for the proposed project any on-site toxic and hazardous materials usage and storage.

C-11

(h) Page 4-144, Geology and Seismicity

The DEIR does not provide an adequate discussion of site geology, seismicity, identification of the fracture zone, or liquefaction potential. Core sample depth (44 feet) appears inadequate. Discussion of mitigations appear to be absent.

C-12

(i) Page 4-151, Biological Resources

While it is possible that the very limited discussion of biological resources adequately describes the potential impacts to the biological resources of the Bayfront, there is a conspicuous absence of any positive contribution by the project to enhancement of the zoological (especially avian) environment.

C-13

(j) Page 4-154, Meteorology

Wind rose and mean speed statistics are not an adequate basis upon which to evaluate building profiles and orientations, or glass exposure. Wind speed distribution functions should be given as a function of building heights.

C-14

(k) Page 7-1, Para. 7.3, Aesthetics and Viewsheds

This paragraph seriously misstates the consequences of the proposed project.

C-15

3. Typographical Errors

(a) Page L-142

Within the first "bullet", second sentence, replace "F" by "C".

] C-16

(b) Page L-208

Within the legend, the page citations are missing.

] C-17



Port of San Diego

and Lindbergh Field Air Terminal

(619) 291-3900 • P.O. Box 488, San Diego, California 92112

0068604

May 31, 1990

Officer in Charge
Western Division Naval Facilities Engineering
Command Detachment, Broadway Complex
555 West Beech Street, Suite 101
San Diego, CA 92101-2937

Subject: Navy Broadway Complex Project EIS/EIR

Dear Sir:

Our review of this document has prompted the identification of areas where it is felt that there is a deficiency in the information provided. These matters deal with: (1) the ability of the project to stand on its own merits without shifting development costs to other entities, (2) encroachments into the Lindbergh Field flight path, (3) curtailment of direct access by the closure of Broadway from downtown, and (4) a continuation of a serious deficit in the provision of on-site parking facilities.

The project should be evaluated so that it would stand on its own merits rather than to continue the efforts to use adjacent properties not owned or controlled by the Navy to add amenities. The District retains planning jurisdiction for its area, and has not assumed responsibility to carry forward the Navy's general proposals on Port lands. In particular, the public cost created by this development plan should be documented for the cost of suggested off-site open space, street closures, and new street systems. Public subsidies necessary for the museum operations proposed in the project should also be identified in the EIS.

The Navy's plan proposes a 400 foot tall building which is a 100 foot encroachment into the aircraft flight path at the foot of Broadway. The EIS should discuss the cumulative impacts of flight path height clearance encroachments by individual buildings in this area.

The closure of Broadway to direct vehicular traffic will curtail access from downtown to Harbor Drive and the adjacent shoreline. In the area between Ash Street and Market, which consists of a six block length,

D-1

D-2

D-3

Officer in Charge
 Western Division Naval Facilities Engineering
 Command Detachment, Broadway Complex
 May 31, 1990
 Page 2

Broadway is the only street at present which links downtown to the shoreline. The District's current planning policies encourage retention of Broadway as well as a new street to serve B Street Pier which would run across Port properties on an alignment close to B Street extended. The streets proposed by the Navy's plan for C Street and the linkage from C to Broadway are not consistent with our planned development. The Navy's illustration also shows C Street severing Port property in a way which would cause a diminution in value. The EIS should not assume that C Street and its proposed link to Broadway will be built, and under those circumstances, draw conclusions as to the impact of traffic on the intersections in the area.

D-3

All of the Navy's proposed development alternatives contain severe deficiencies in on-site parking supply. Since the proposals only provide from 50 to 55 percent of the total on-site parking demand, an unusually heavy reliance is placed upon transportation demand management techniques and on adjacent areas to fully meet the parking demand generated by the proposed development. The Navy appears to be providing only about 21 percent of its total on-site parking demand, which has placed undue competition for available parking spaces in the surrounding streets, adjacent parking areas, and in those areas allocated for commercial activities at G Street Mole, Seaport Village, and Lane Field. In the future, it is not anticipated that these areas will be available to meet the parking demand of Navy property development. The project tends to continue the adverse impact of inadequate parking facilities on Navy property, both at the proposed Broadway Complex development and at the Engineering Facilities Command on Pacific Highway.

D-4

Corrections to the contents of the EIS are suggested. On page 3-6, the report states, "...provision of open space outside of the project boundaries is not part of this project..." yet numerous illustrations show a dependent interface with a proposed open space area outside the project (Figures 3-4, 3-5, 3-6, 3-9, 3-14, and 4-4). The referenced maps should be corrected to reflect the current status of the adjacent area as shown in Figures 3-10, 3-11, 3-12, and 3-15. On page 4-11, the illustration of pedestrian oriented streets, walkways, and plazas, should be corrected to show the planning policies of the Port Master Plan if this document (the EIS) insists on covering those areas outside of the jurisdiction of the military. As presented, the representation seems to imply official sanction where none exists.

D-5

D-6

The discussion on page 4-20 dealing with the Port's planning jurisdiction and review by the California Coastal Commission should

D-7

0000004

Officer in Charge
Western Division Naval Facilities Engineering
Command Detachment, Broadway Complex
May 31, 1990
Page 3

be revised. The California Coastal Commission would only review a project already identified in the Port Master Plan if it falls within the definition of an appealable development in the California Coastal Act. If a development is determined not to be consistent with the Port Master Plan, then the project could not proceed or a plan amendment would be filed for review and certification by the California Coastal Commission.

D-7

Very truly yours,


DON L. NAY
Port Director

DLN:jr

DEPARTMENT OF TRANSPORTATION
DISTRICT 11, P.O. BOX 85406, SAN DIEGO 92186-5406

0000005



June 1, 1990

11-SD-005
(SD-Centre City)

Officer in Charge
Western Division
Naval Facilities Engineering Command Detachment
Broadway Complex
555 W. Beech Street, Suite 101
San Diego, CA 92101-2937

Attention L. D. Misko, Director of Planning

Dear Mr. Misko:

DEIS/DEIR for the Navy Broadway
Complex Project, San Diego, CA

Caltrans District 11 comments are as follows:

Page 4-47: These highway improvements have not been programmed by Caltrans. Page 4-73 indicates that they are based on 1986 SANDAG information.

E-1

The Navy and the City of San Diego should provide financing for a southbound direct connection from Interstate Route 5 to Pacific Highway. That mitigation would help to provide additional capacity for the increased traffic in the Centre City area.

E-2

Our contact person for Interstate 5 is Jim Linthicum, Project Manager, Project Studies Branch "B", (619) 237-6952. For information on Transportation Demand Management (TDM) strategies contact Manuel Demetre, Chief, Regional Ridesharing Branch, (619) 237-POOL.

Sincerely,

JESUS M. GARCIA
District Director

BY

JAMES T. CHESHIRE, Chief
Environmental Planning Branch

MO:ec



THE CITY OF

SAN DIEGO

525 "B" STREET • SUITE 2002 • SAN DIEGO, CALIFORNIA 92101 - 4411

0000006

PLANNING
DEPARTMENT
OFFICE OF THE
CITY ARCHITECT
533-4500

May 31, 1990

Mr. L. D. Misko
Director of Planning
c/o Officer in Charge
Broadway Complex
555 W. Beech Street, Suite 101
San Diego, CA 92101-2937

Subject: Broadway Complex Draft EIR/EIS

Dear Mr. Misko:

This is in response to your request for written comments on the above referenced document. As you are aware, the City Architect's Office has been included in negotiations which will culminate in a development agreement between the U.S. Navy and the City of San Diego for development of this sixteen-acre site. We are also aware that the City of San Diego is the lead agency on this EIR/EIS. Because of our role in the development agreement and our responsibility to relate to projects of this magnitude from both a planning and urban design perspective, we felt it appropriate to forward these comments for your consideration.

As part of this development agreement process, the City Architect has provided considerable input into the evolution of the preferred alternative for this project (Alternative A). In addition, the Broadway Complex Coordinating Committee (BCCG) and the Centre City Planning Committee (CCPC) have provided considerable direction to the Navy for development of this site and others on the Central Bayfront.

This direction has resulted in the Navy's use throughout Alternative A of those planning objectives recommended as part of both the BCCG and CCPC recommendations. Alternatives B-F may achieve some level of conformance with these recommendations; but, because they may vary in some way from both Alternative A and each other, none of these alternatives achieves the same consistency with the stated objectives of these plans.

F-1

Mr. L. D. Misko
May 31, 1990
Page 2

Two areas which we feel warrant further clarification are: 1) the expressed need in Alternative A for 800 above-grade parking spaces (depicted as 800 spaces in a five to six floor, 300,000 SF encapsulated above-grade structure), and 2) the mitigation of regional air quality degradation as a result of the proposed increase in vehicle traffic in the area as a result of this project.

F-2

In the case of the above-grade parking, the stated objective of both the BCCG and CCFC plans is to restrict above-grade parking facilities throughout Centre City and, in particular, the Central Bayfront. We feel that this alternative should be developed further, either eliminating some of these spaces, undergrounding them, or positioning them in other underground facilities spread throughout the sixteen-acre site.

F-3

Mitigation of regional air quality impacts requires a more elusive remedy and may ultimately result in a provision or requirement for alternative modes of transportation rather than reliance on providing the amount of proposed on-site parking.

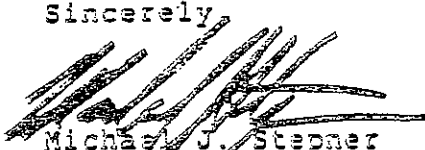
F-4

In summary, we find the proposals in Alternative A to be in substantial conformance with both existing and proposed Centre City Planning. The two (2) items referenced above are significant in both their impact on the urban form of the city and the region's air quality, and should be evaluated in subsequent responses to comments on the EIR/EIS.

F-5

Questions regarding this letter should be addressed to Lawrence C. Monserrate, Principal Planner (619-533-4516).

Sincerely,


Michael J. Stepner
City Architect

MS:LM:cyc

cc: Maureen Stapleton, Deputy City Manager
Ernest W. Hahn, Chairman, CCFC
Pam Hamilton, Executive Vice President, CCDC
Ann Hix, Development and Environmental Planning

CRAIG ADAMS

0000007

125 Arbor Drive, San Diego, CA 92103-619/293-3649

U U 4 2 2 4

June 3, 1990

Officer in Charge
Western Division Naval Facilities Engineering Command Detachment
Broadway Complex
555 West Beach Street, Suite 101
San Diego, California 92101-2937

Jun 4 4 40 PM '90

Subject: Comments On the Draft Environmental Impact Statement (EIS), Navy Broadway Complex Project,
San Diego, California

Attention: Officer in Charge

The following review comments are offered to assist the United States Navy in its planning and deliberation concerning its future plans for the Broadway Complex site in San Diego and to aid public officials, such as members of the San Diego City Council, who will represent the citizens of this community in negotiations concerning this matter.

The author of these comments has closely followed developments relating to Centre City planning in San Diego over the last year and one-half — including attendance during this period of nearly all the meetings of the Broadway Complex Coordination Group and the Centre City Planning Committee. The author has training in planning, a masters degree in Metropolitan Studies from Syracuse University plus an MBA from the University of Wisconsin and professional planning experience as the Deputy Director and Director of the Wisconsin State Planning and Energy Office. These comments are offered on my own behalf as an interested citizen and do not represent any organized group.

The remarks are presented in three sections: 1) summary of comments; 2) elaboration of comments on major points; and 3) more technical comments concerning specific sections of the EIR. To simplify matters, except where there are references to specific alternatives, such as Alternative F, all the remarks are directed to the EIR's treatment of Alternative A, the Navy's preferred alternative.

Although these comments raise some concerns about the completeness of the EIR analysis in specific respects, the Navy should be commended for the general breadth of scope and thoroughness of the EIR. Of special note is the provision of the paired photographs and visual simulations which depict panoramic views of the proposed site development and the surrounding areas. This material should prove very helpful to decision makers in evaluating the aesthetics and viewshed. The EIR is well organized and provides a generally comprehensive and clear basis for public discussion and public official action. The following comments are intended to enhance its completeness and usefulness.

SUMMARY COMMENTS

- 1) The underlying policy issue involves the appropriateness of applying the "co-location" concept, whereby a new Navy office facility would be developed at no- or low-cost to the general taxpayers by revenues gained from private development on the site. Because the Draft EIS severely limits its discussion of alternatives that do not maximize the co-location objective, it is difficult for citizens and policy makers to assess the relative advantages — or disadvantages — of the co-location approach.

G-1

Page 2 - Comments on Broadway Complex EIR
By Criag Adams

- 2) The alternative, which explores potential reuse of the site under a traditional funding approach, should be refined — or an additional alternative developed which can test the relative benefits and costs of a reduced emphasis on the no-taxpayer-cost, co-location approach. The construction of an alternative which emphasizes surface parking does not present a reasonable comparison. G-2
- 3) Depending on interpretation, there are a number of instances where the recommended project alternative might be in conflict with planning policies established by the State and the City. Specifically, these include the City's policy supporting a concentrated office and commercial core and stepped intensity and scale of development toward the waterfront and the State's management of tidelands which stresses the use of this scarce resource for directly ocean-related uses. In some cases the EIS overlooks these issues; in others it supplies its own conclusions based on limited technical information which do not address the range of trade-offs or some key areas of policy judgement. G-3
- 4) The EIS does not highlight the fact that office development located literally on the waterfront is a break with previous planning policies in San Diego. Under present State and City policies it is not likely that high-rise, general commercial offices could be developed in the tidelands area, except as the jurisdictions of these two entities are superseded by federal authority. Policy makers should have more information than is presented on the implications of this type of development for other areas of the core and with respect to the utilization of a very scarce resource — waterfront land. G-4
- 5) Previous transportation studies have concluded there was the potential for significant congestion on Centre City freeways and freeway ramps as the result of planned development in the Centre City. The Broadway Complex Project would increase the previously analysed development level. However the EIS does not systematically address potential impacts on the freeway and freeway ramp system. G-5

AREAS OF CONCERN REGARDING THE EIS

Treatment of the Co-location Concept The underlying public policy issue facing both federal and local decision makers concerning the Broadway Complex facility involves the Navy's proposal to offset the cost of development of a new San Diego Regional Administrative Office by means of a ground lease and private development on a large proportion of the present Navy site. The proposed co-location approach involves potential trade-offs between the cost savings to the nation's general taxpayer and potential benefits that might be gained by alternative uses for the Broadway Complex site other than those necessary to accomplish the no-cost objective for new Navy office development. These types of trade-offs are not discussed nor, as argued in the following point, is adequate information provided about alternatives to weigh these considerations. G-6

The need for, priority of and location for a new Navy regional office facility is best addressed by weighing the proposed project against others in the established Defense Department and Congressional budgetary process. Focusing on the cost-to-taxpayer reductions made possible because of the fortuitous location of the present facility that has become valuable property is a questionable resource allocation and commitment procedure. G-7

Adequacy of Alternatives To appropriately assess the co-location option, there should be a base of comparison against an alternative approach — in this case, development of a Navy office facility under traditional authorization G-7

Page 3 - Comments on Broadway Complex EIR
By Craig Adams

and appropriation procedures and the reuse, under established procedures, of the portions of the site not needed for the office facility.

The EIS provides a very restricted set of information to assist in this type of evaluation. Alternative E, which is intended to provide a point of comparison involving traditional funding for Navy office development on the site, is especially uncreative and does not reflect alternative benefits which would be possible with traditional development of a new Navy office facility. The implication that the only alternative use for much of the site — if a new Navy office were developed from traditional funding sources — would be for surface parking is either unimaginative or less than straightforward.

G-7

As an example of the type of alternative that would be possible, I would direct the Navy's and other interested parties' attention to the design concept which was developed by an architectural team headed by Rob Quigley in a design competition for the G Street Mole which immediately adjoins the Broadway Complex property. Quigley's G Street Mole Embarcadero proposal included a mix of uses some serving the commercial fishing industry, an urban amphitheater plus community and visitor facilities, including an aquarium, information center, fishing museum, theater and retail activities.

In effect, the Navy is indicating that much of the present Navy Broadway Complex facility is surplus to its direct mission needs. This perspective is especially interesting in light of the fact that the Broadway Complex properties have been deeded to the Federal Government by the City of San Diego — presumably for use in the direct exercise of federal government activities.

There are well established procedures for the disposal of surplus federal property. The EIS does not acknowledge this option nor does it identify the types of reuse, and the associated benefits, possible under such a scenario — specifically the potential for lower-scale and lower-density development immediately adjacent to the Bay and the potential for a larger commitment to public open space. In addition, the options do not explore the trade-offs that might be possible by partial use of the co-location concept to offset a portion of the cost of a new Navy office facility. It may be up to local community interests to formulate this type of alternative.

G-8

PLANNING and LAND USE CONSISTENCY

Until the Broadway Complex development was proposed by the Navy, there was little formal local planning consideration of the proposed site — apparently the various local planning entities assumed the property would continue in direct Navy use for maritime-related activities. Neither the Port's Embarcadero Plan nor the present Centre City Community Plan (adopted in 1976) address this area of the waterfront in terms of desired uses. The recommendations of the Broadway Complex Coordinating Committee, which directly considered the Broadway Complex proposal, are at this stage advisory; they have not received public discussion outside the Centre City Planning Committee process nor consideration and action by elected officials.

G-9

However, the community has experienced extensive public discussion and debate concerning the nature, particularly the scale, of development in the immediate vicinity of the waterfront — especially south of Harbor — Drive with strong concerns expressed that a "walling-off of the Bay" has occurred. The primary issues have involved the adequacy of public open space along the Bay; the compatibility of nearby high-rise development with public areas along the water; and physical and visual access to the Bay. The EIS makes no acknowledgement of these

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By Craig Adams

conflicts and debates. Also, because of the limited nature of the alternatives that are examined (discussed in "Adequacy of Alternatives" above), there is no detailed evaluation of the underlying potential conflicts and trade-offs.

G-9

As indicated in the EIS, the Draft Centre City Community Plan highlights that the Waterfront is to "serve as its (the City's) major open space, its park and its playground." While the EIS clearly establishes the improvements that will be made in pedestrian access through to the Bay when compared to the existing Navy facility, it does not address the impacts on pedestrian uses along the waterfront nor does it identify what more extensive public-oriented uses might be made of the portions of the property not directly needed for Navy administrative offices. Plans for the Centre City have stressed the objective of a "concentrated urban core" of office and commercial activities. The preferred Broadway Complex proposal will further extend the limits of the office district which is now expanding westward along Broadway. The important point is that this waterfront-related office development has implications for other areas in the Centre City. The EIS should address the likelihood that the favored Bayside location of the proposed commercial office developments on the Broadway Complex site will be at the expense of originally defined core area — and that this weakening of the office core will impact on commercial redevelopment potentials, especially in the Core and Centre City East.

G-10

G-11

The Draft Centre City Plan also supports the concept of "stepped intensity and scale" of development. While there are varying interpretations of what this concept means and how it should be applied — particularly whether it should extend to the water in all direction from the existing core or only to the north and to the south from a Broadway "spine" — its significance should be acknowledged and the possible impacts of the proposed Broadway Complex development evaluated. One thing is clear. The "stepped intensity and scale" concept, as it has been discussed, was not forwarded as a project-level design concept; it was intended to provide guidance to the general urban form of the Centre City, extending over the area of many blocks.

G-12

Waterfront Commercial Office Development

Prior to the Navy proposal for co-location development of the Broadway Complex, there are no indications in history of planning for San Diego's Centre City area that high-rise, private office development was considered an appropriate use on properties directly adjoining the waterfront.

With the exception of federal property, control of the tidelands within the City of San Diego is the responsibility of the San Diego Unified Port District. The Port District was established in 1952 by the State Legislature with the duty to act as trustee for the people of California in promoting commerce, navigation, recreation and fisheries on the state tide and submerged lands around the periphery of San Diego Bay. Under its State enabling provisions, the Port is prohibited from developing office uses within the tidelands area, except as they may be directly related to the administration of Bay-related activities.

G-13

This state legislative restriction is apparently based on the conclusion that the tidelands are a "scarce resource" that is to be managed in support of uses directly related to the Bay. It also implies that there is sufficient land available away from the waterfront to accommodate general office development. This conclusion has been confirmed by the work of the Centre City Planning Committee which has concluded that, at present and expected absorption rates, there is sufficient land available in the core area to accommodate office development for "upwards of ninety-nine years".

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Page 5 - Comments on Broadway Complex EIR
By Craig Adams

The Navy Broadway Complex preferred alternative, which provides for the development of 650,000 square feet of commercial office space, stands in striking contrast to the State policy for management of these tidelands. Development of general office facilities on the Broadway Complex site would be permitted only because of federal jurisdiction over this property. If the land were declared surplus for federal needs, its ownership and control would logically revert to the jurisdiction of the Unified Port District which would be restricted from developing it for general office use.

G-13

It is worthy of note that a recent Urban Land Institute report on Centre City San Diego recommended that the Navy limit its presence in the project area to uses requiring an oceanside location.

Transportation/Circulation

The 1985 Centre City Transportation Action Program (CCTAP), prepared for the City of San Diego by PRC Engineering, identified a series of traffic capacity and circulation problems projected for the Centre City area. Prominent among these problems were capacity deficiencies on the freeways and for several of the freeway ramps serving the Centre City. For the set of growth-assumptions that in retrospect seem most realistic, SR-163, I-5 north of the Centre City and SR-94 were projected to be over-capacity by about the year 2000. Also, capacity deficiencies were identified for a number of freeway ramps, especially those which most directly serve the western portions of the Centre City including I-5 northbound at Elm; SR-163 northbound at Eleventh; I-5 southbound at Fifth and I-5 southbound at First.

G-14

The CCTAP report concluded these deficiencies would be particularly hard to remedy not just because of fiscal resource limitations but also because there were underlying physical and political constraints to adding freeway and freeway ramp capacity. Since these projections were made, the planned development density for the Centre City area has increased; the proposed Broadway Complex development would further increase development and traffic loadings.

The traffic analysis prepared as part of the Broadway Complex EIS does not address the incremental or cumulative impact of the project on freeway congestion. Information is presented with respect to projected traffic volume on some of the freeway ramps but the ramps examined are selective and do not represent those identified as the major problems in the CCTAP analysis. These potential impacts deserve focused technical attention.

The underlying question of whether traffic is better accommodated (less negative impacts) with office development in the traditional core area versus the extension of office development to the west, along Broadway is not addressed.

G-15

COMMENTS ON EIS SPECIFICS

Following are comments on specific sections of the EIS document:

1.1 Introduction (Pg. 1-3 concerning the Memorandum of Understanding with the City of San Diego) The presentation implies that the City, through the Memorandum of Understanding, has made a commitment to support the Broadway Complex development. While the precise nature of the City's commitment is subject to legal interpretation, the EIR should give recognition to the fact that the Memorandum indicates that it "is entered into

G-16

Page 6 - Comments on Broadway Complex EIR

By Craig Adams

for the sole purpose of providing guidelines for the planning and preparation of documents including the proposed development agreement." (July 1, 1987 Memorandum of Understanding Between the City of San Diego and the U. S. Navy; Resolution Number R-268458) The City's formal position relative to the Broadway Complex proposal should be presented as clearly as possible; the conditional nature of the City's participation under the Memorandum should be highlighted in the EIS.

G-16

3.2 Alternatives (Pg. 3-5 concerning Residential Alternative) The option of developing the site for housing is summarily dismissed. The trade-offs of the potential benefits of housing development against those of hotel and office development and the Navy's financial objectives should be explicitly addressed.

G-17

3.2.1 Alternative A (Pg. 3-8 concerning FAR calculation) The floor area ratio (FAR) of 5.45 for the preferred alternative is apparently calculated based on the acreage shown on the Project Blocks illustration, Figure 3-3. This calculation seems to include the portion of the site which is planned to be dedicated for the extension of G street through the redeveloped property. If it has not already been, the area of the planned G Street dedication should be excluded from the calculation of the FAR. This procedure is consistent with the approach which is now used by the San Diego Planning Department in dealing with "superblocks" and will establish comparability with the City's plans for the surrounding area.

G-18

3.2.5 Alternative E (Pg. 3-23 concerning a new Navy office complex funded using traditional federal budget mechanisms) The alternative presented here is particularly constrained and uninspired. Certainly new Navy office facilities could be accommodated on the site while permitting uses other than surface parking. This proposed alternative would be in clear conflict with City policy which discourages waterfront use of land for surface parking. And specifically, why is an new office building cited on Block 3 when its location on either Blocks 1 or 2 would serve to free waterfront acreage for more directly waterfront-related use?

G-19

4.1.1 Land Use Compatibility (Pg. 4-12 concerning the land use Environmental Consequences of the Proposed Alternatives) The discussion here is limited to "compatibility" of land uses. No discussion is presented of the fact that the commitment of the very scarce waterfront land use to office, hotel and retail development would preclude its availability for other uses.

G-20

4.1.1 Land Use Compatibility (Pg. 4-12 concerning stepping down). The discussion highlights the proposal that the project design would provide a "step down" of buildings to the waterfront within the project boundaries. It should be clear that this "step down" concept, which in the case of the east-west dimension is within a single block, is at a different scale than the "stepped intensity and scale" concept discussed as part of the Centre City planning process.

G-21

4.1.5 City of San Diego Plans and Policies (Pg. 4-29 Concerning the CCPC Concept Plan) The EIS refers to the Concept Plan which was distributed in August, 1988. This document has been superseded by the draft Preliminary Centre City San Diego Community Plan, dated February, 1990. It would be appropriate for the EIS to note that the Centre City Planning Committee has supported the Broadway Complex project as compatible with its work in developing a new Centre City Community Plan - and to note that the work of this group is advisory to the Planning Commission and the City Council.

G-22

4.2.2 Transportation Environmental Consequences of the Proposed Alternatives (Pg. 4-53 concerning Long-

G-23

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By Craig Adams

Term Roadway Conditions) As indicated earlier, the EIS analysis fails to address the situation of the freeways in the vicinity of the Centre City and the freeway ramp situations where studies have previously identified potential problems. The conclusion on Pg. 4-54 that "(t)raffic projections at the four freeway interchanges serving the Centre City area indicate that there is adequate capacity to serve anticipated demand under the long-term scenario" seem inconsistent with the conclusions in the Centre City Transportation Action Program. The proposed Broadway Complex development is likely to contribute to the cumulative impact of planned office developments in the West Broadway area. Past analyses of the situation projected on the freeways and the freeway ramps suggests that it may not be possible to mitigate this congestion. A similar finding may be necessary in the case of the Broadway Complex project.

G-23

4.2.2 Transportation Environmental Consequences (Pg. 4-60 through 4-64 concerning Long Term Parking Conditions. The Parking Needs Assessment indicates that a substantial portion of parking needs for the development is expected to be met by the application of a Transportation Demand Management (TDM) plan — in the case of office-related parking, 24% of the need is projected to be accommodated by a TDM plan. The information that is provided regarding the nature or provisions of the TDM plan is merely a list. Without more specific documentation, the evaluation reflect a "goal statement" and cannot be the basis for assessing possible impacts. These same concerns about the probable effectiveness of TDM extends to the discussion in 4.8.2 Air Quality Environmental Consequences, Pg. 4-172 which is also based on TDM assumptions.

G-24

4.3.1 Aesthetics and Viewshed - Affected Environment (Pg. 4-74 through 4-111) The EIS gives exceptionally thorough treatment to a number of aesthetic and view considerations. However, it does not explore the potential impacts of the project on public views from along the waterfront Embarcadero, including from the G Street Mole, and from the Bay to the South and immediately to the West. This is an especially important consideration since planning policy identifies the waterfront as the City's "major open space, its park and playground". Part of the "waterfront experience" is the visual ability to relate the waters edge to the City's "core" and to other topographic features which give it a physical definition. My casual assessment suggests that views back to the City, especially from the G Street Mole will be negatively impacted by the development proposal. Also, the potential impacts of views from the water to the coastal rim which defines the northwest edge of the Centre City area should also be evaluated.

G-25

4.5.1 Socioeconomics - Affected Environment (Pg. 4-139 concerning the Fiscal Impact Assessment) The use of per capita and per acre methodologies to calculate the operating public costs of servicing the project, while popular because of their simplicity, seem, at best, to be crude approximations. The area under evaluation has a relatively unique set of public service needs when compared with the City in general. At the least, the EIS should indicate a relatively low level of statistical confidence in the results of this work, particularly on the cost side of the equation.

G-26

4.5.1 Socioeconomics - Affected Environment (Pg. 4-142 concerning net and cumulative fiscal impact) In a discussion with your office I raised a question concerning the accuracy of the net and cumulative fiscal impact statistics — specifically as related to the "business taxes" projections in the Williams & Kuselbeck Technical Report (Table 16). The magnitude of the numbers seem inconsistent with present City-wide revenues in these categories and with the general scope of the planned development. I have not heard back on this issue. Although I share the EIS's conclusion that the fiscal effects of the proposed project are likely to be positive, it isn't all clear that these will provide a net benefit to the City — since this same level of development, with similar project-level

G-27

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Page 8 - Comments on Broadway Complex EIR
By Craig Adams

fiscal benefits is likely to occur even in the absence of the proposed project.

I hope these comments will be useful to the Navy in its continuing work on the Broadway Complex Project and that it will assist citizens and public officials in their discussions and evaluations of this important matter.

G-27

Respectfully,



Craig Adams
293-3649

cc. Office of the City Architect
Office of Councilman Bob Filner
Office of Councilman Ron Roberts

0000008

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

STATE LANDS COMMISSION

LEO T. MCCARTHY, Lieutenant Governor

GRAY DAVIS, Controller

JESSE R. HUFF, Director of Finance

EXECUTIVE OFFICE

1807 - 13th Street

Sacramento, California 95814

CHARLES WARREN

Executive Officer

(916) 322-4105



File Ref: G-10-07

G-10-08

W 24323

June 4, 1990

Officer in Charge
Western Division
Naval Facilities Engineering
Command Detachment
Broadway Complex
555 West Beach Street, Suite 101
San Diego, CA 92101-2937

ATTENTION: Captain Wayne Goodermote, CEC United States Navy

Dear Captain Goodermote:

Staff of the State Lands Commission has reviewed the Draft EIS (DEIS) for the proposed redevelopment of the Navy Broadway Complex. We have also reviewed a copy of the document which is represented as a Draft EIR (DEIR) circulated by the City of San Diego for this project. We do not understand why this format was chosen for a document of such import. In our view, the document should have been an EIR/EIS, one document which incorporates the requirements of the CEQA and the NEPA; such a format is specifically provided for within the State EIR Guidelines. As constituted, the documents and format are disjointed and confusing. Furthermore, we do not believe the incorporation of the DEIS into the DEIR conforms to the requirements of Section 15150 of the State EIR Guidelines which states, in part:

"(c) Where an EIR or Negative Declaration uses incorporation by reference, the incorporated part of the referenced document shall be briefly summarized where possible or briefly described if the data or information cannot be summarized. The relationship between the incorporated part of the referenced document and the EIR shall be described."

H-1

CAPTAIN WAYNE GOODERMOTE

June 4, 1990

Page 2

For this and additional reasons which are discussed below, we contend that the document(s), as presently constituted and circulated, are wholly deficient and inadequate under the requirements and standards set forth in the CEQA, the NEPA, and related case law. Our comments, while referencing the DEIS, are equally applicable to the DEIR and should, therefore, be regarded as comments on said document.

H-2

GENERAL COMMENTS

(1) Our initial comments on this project as reflected in our December 22, 1988 letter to you in response to the NOI/NOP for this project have not been addressed in the DEIS. The State of California has claimed a potential reversionary interest by virtue of the Public Trust Doctrine in the filled tidelands comprising the Broadway Complex. The Navy has not resolved the issue of this claim.

Specifically, our comments indicate the problems associated with the title to the property vis-a-vis the nature of the title to the Public Trust lands conveyed to the United States for certain limited purposes; i.e., "public defense", "military purposes", and "piers, landing and structures to be used by the United States Navy Department for a supply base and for landing purposes."

H-3

The uses authorized for the State's property appear, as provided for in Alternatives A, B, C, D, E and F of the DEIS, to be in direct conflict with the uses proposed for the property. Other than the 1 million square feet of naval office space proposed for the area -- the other proposed uses are non-military. Clearly, up to 1.4 million square feet of private office space, 1.44 million square feet of hotel, and 25,000 square feet of retail do not constitute military purposes.

(2) The DEIS, for various project alternatives (i.e. pg. 1-9), identifies the need for substantial offsetting "local government" financial contributions for certain public infrastructure improvements. The document fails to identify and detail the specifications of the necessary infrastructural improvements, the estimate of the cost, and the source of those "local government" financial contributions.

We are informed that the estimates of the Center City Development Corporation's Public Improvement Cost Allocation (dated 5/10/90) for the Site Improvement Cost of the Navy Broadway Complex Project (dated July 28, 1989) related to the project which is referenced in the Summary of Alternatives \$1.22 (pg. 1-9) of the Draft EIS and elsewhere in the text and as incorporated by reference in the Draft EIR, total over \$25 million and provide over \$20 million in proposed expenditures by the San Diego Unified Port District.

H-4

CAPTAIN WAYNE GOODERMOTE

June 4, 1990

Page 3

The SDUPD is limited in its ability to expend tidelands trust funds on property not owned or controlled by the Port. The Port does own some of the streets within the Navy Broadway Complex Project site; these, however, are presently under lease to the Navy. Any infrastructure, demolition, landscaping or similar costs associated with this project cannot be financed with tideland trust funds unless they are on Port-owned or controlled lands. The Port may only expend tidelands trust funds on lands or projects if such expenditure provides some substantial and direct benefit to the tidelands trust under their control. The substantial sums identified for expenditure by the Port do not qualify under the above stated criteria.

H-4

Further, because the DEIS identifies the need for local public funds for this proposed federal/private development, but fails to provide specificity as to costs and sources of funds, the social economic impacts and legality of those required expenditures are potentially significant, unresolved impacts.

H-5

(3) The mitigation measures within the DEIS can be characterized respectively as unspecific, prospective, nonexistent, or inappropriately characterized.

As an example, the mitigation for aesthetic impacts for specified alternatives, as listed on page 4-114, is indicated to be compliance with draft urban design guidelines as specified in Appendix D of the DEIS. Will these impacts still be mitigated if the guidelines are changed in any way?

H-6

As an additional example, on page 4-211, under Mitigation Measures, the DEIS states that the State SHPO "is consulting with the Navy on mitigation."

H-7

On page 4-147, compliance with building codes is characterized as mitigation for geologic hazards in direct contradiction of the principle that compliance with existing law or regulations does not constitute mitigation.

H-8

Lastly, mitigation measures are not analyzed, as required by the CEQA, for their effectiveness in reducing significant impacts to a level of insignificance. The document assumes effectiveness and asks that we accept its conclusions without any supporting evidence.

H-9

(4) On page 5-1, Cumulative Impacts, the DEIS states, "The Navy Broadway Complex is located in an area of San Diego that is undergoing substantial development....Cumulative impacts are generally regional impacts associated with several developments to which the project may contribute." Unfortunately, the discussion which follows and which precedes it in Section 4 is not consistent with such statements. The project is discussed only in relationship to itself or its own alternatives, not in relationship to related projects such as Seaport Village, the Hyatt Hotel, among others.

H-10

CAPTAIN WAYNE GOODERMOTE

June 4, 1990

Page 4

(5) We believe the designation of Alternative A, the project, as the environmentally superior alternative is not supportable under the provisions of Section 15126(d)(2) of the State EIR Guidelines. Since Alternative A, "The Navy's preferred alternative" (page 1-4), is the project and "the no-action alternative, is the environmentally superior alternative," the correct interpretation of the above section dictates the designation of an environmentally superior alternative which is revealed as a result of the environmental analysis and which is separate and distinct from either "the project" or the "no-action alternative."

H-11

(6) We do not believe that each of the alternative configurations of the Navy's preferred alternative, the project, is discussed to the same level of detail as required by the NEPA. The document does not enable decision-makers to, without additional analyses, consider any of them in place of the project.

H-12

SPECIFIC COMMENTS

Pages 1-16-18,
Section 1.4.1:

It would be helpful for reviewers if the responses to the NOI/NOP were included in the document as an appendix and the comments therein referenced to those portions of the document in which the response to each comment is located.

H-13

Page 1-91,
Section 1.5:

This "summary table" does not contain a summary of mitigation measures as stated. Furthermore, this section should contain a discussion of significance criteria used to rank the impacts discussed within the document.

H-14

Page 4-60, Long-
Term Parking
Conditions:

The entire issue of parking impacts related to the project appears unresolved and unmitigated. At page 4-60, the document states that "The City of San Diego has no minimum or maximum parking requirements for development in the Centre City area...The development of a parking management plan for the Centre City area is the primary objective of the ongoing Parking Management Study for the Centre City and Balboa Park areas" (emphasis added). The determination of impacts, their

H-15

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CAPTAIN WAYNE GOODERMOTE

June 4, 1990

Page 5

significance and appropriate mitigation again appears to be a moving target. Even under this circumstance, the project would not provide sufficient parking, with attendant, speculative adverse impacts on existing parking. Furthermore, such impact is to be mitigated by a "Long-Term Travel Demand Management (TDM) Program" which could include a number listed measures (see general comments on speculative nature of mitigation).

H-15

Page 4-61, "Uses": What is the demand rate for residential uses?

H-16

Page 4-108,
Section 4.3.2:

The document states that, "The draft design guidelines are provided in Appendix D and are subject to minor refinement between the Navy and the City. Alternatives A, B, and the onsite component of Alternative D are all generally consistent with the draft guidelines. Alternatives C and F are partially consistent. Alternatives E and G are not consistent" (emphasis added). In spite of these statements, the conclusion reached on page 4-114 is that compliance with such guidelines would mitigate aesthetic impacts of the project and Alternatives B, C, D and F. This conclusion is: 1) unsupported, as are all other statements regarding mitigation (see general comment 3); and 2) at best dependent on a modifier "if the project and its alternatives are modified (needs to be described) and if the guidelines remain substantially unchanged."

H-17

Page 4-115,
Section 4.4.1
Environmental
Consequences:

What is the basis for the statement "The existing police facilities, manpower, and available equipment are adequate to provide the project site and surrounding area with a sufficient level of police protection in cases of "emergency"? What is the definition of "sufficient"? What of everyday protection in comparison to "in cases of emergency"? Would the project site overtax police services, etc. when considered with other related area projects (see general comment 4)?

H-18

CAPTAIN WAYNE GOODERMOTE

June 4, 1990

Page 6

Page 4-118,
Mitigation
Measures:

The documents states that the private development within the project has the potential to cause regional immigration. This is growth inducing impact which is not discussed in Section 6 (page 6-1).

H-19

Page 4-121,
Environmental
Consequences:

While the proposed project and alternatives "would not adversely affect existing water facilities," it is not clear, considering the state of the drought, that there will be sufficient water available to be put within the existing facilities for project needs. What effect will the project have, in conjunction with other projects, on water supply? Which other uses may have to be limited in order to supply the project, etc.?

H-20

Page 4-126:

Despite the statements in the first paragraph which depreciate the impacts of the project on the City's wastewater problem, the building of the project will still exacerbate the City's existing violation of water quality compliance standards. This is a significant adverse impact that must be addressed.

H-21

Page 4-126,
Mitigation
Measures:

The "measures" listed are actually "impacts" caused by the project, i.e. facilities will need to be upgraded because of it. Further, these upgrades will only allow material to get to the plant; they will not mitigate for the increase load on the plant which presently, and for the foreseeable future, is in violation of compliance orders.

H-22

Page 4-126,
Section 4.4.7:

Although the project, etc. would decrease the life expectancy of existing landfills (1995), the document concludes there are no significant impacts, presumably because the City is in the process of identifying a replacement landfill site. This conclusion is unacceptable and does not free the applicant from the requirement to either analyze other feasible alternatives or provide mitigation.

H-23

0000008

CAPTAIN WAYNE GOODERMOTE

June 4, 1990

Page 7

Page 4-143,

Section 4.5.3:

Does the first statement of this section consider required expenditures of either the City or the Port? What will be the level of adverse impacts to Port finances as a result of the project, etc., e.g. monies (sales, transient occupancy and property taxes) will accrue to the City, yet the City would have the Port pay the majority share of the costs of the necessary infrastructure and improvements?

H-24

Page 4-144,

Section 4.6.1:

Does the available information indicate that the area soils are able to support the proposed facilities as designed, including underground parking? If so, what is the basis for such a conclusion; if not, what are the related adverse impacts on the parking issue - supply, etc.? Will perpetual de-watering of the site be required-impacts?

H-25

Page 4-147,

Mitigation

Measures:

We have already indicated our concern with the adequacy of the last statement in this section (see general comment 3). The effectiveness of the building codes to mitigate geologic hazards, particularly liquefaction in the instant case, must be examined in light of the recent experience of San Francisco's Marina District. If one presumes that the majority of buildings in that area were in compliance with that City's building code, the document's assumption provides little comfort.

H-26

Page 4-186,

Section 4.9.3:

Why is not the design mitigation for hotels also being applied to onsite office structures? This would also seem important since the occupancy of such buildings would coincide more with the times of highest noise generating traffic.

H-27

Page 4-229,

Section 4.12.2:

Although it is not specifically stated, one assumes that all required electrical power will be supplied by the existing grid. What will be the cumulative impact on the grid from these additional uses and need of power?

H-28

Pages 6-1, 7-1:

Each of these sections should be revised in light of the comments herein.

H-29

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CAPTAIN WAYNE GOODERMOTE

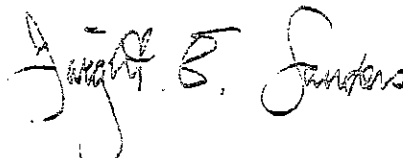
June 4, 1990

Page 8

In conclusion, based on the comments presented, we believe that both the process and document are deficient in their compliance with the CEQA and the NEPA and that substantial revisions are necessary. Should you have any questions regarding these comments, please contact Curtis Fossum, Senior Staff Counsel (916-322-2277) with regard to the State's claim and related matters and me (916-322-7827) with regard to environmental issues.

H-30

Sincerely,



DWIGHT E. SANDERS, Chief
Division of Research
and Planning

DES:maa

cc: Charles Warren, Executive Officer
James F. Trout, Assistant Executive Officer
Robert C. Hight, Chief Counsel
Curtis Fossum, Senior Staff Counsel
Jamee Jordan Patterson, Deputy Attorney General
Maureen A. Stapleton, Deputy City Manager, City of San Diego
Linda Fuller, Office of Planning and Research

00000009

Harry E Wilson
2120 W Callow Ave
Bremerton, WA 98312-2908
June 1, 1990

Officer In Charge
Western Division Naval Facilities Engineering Command
Detachment
Broadway Complex
555 W Beech St
Suite 101
San Diego, CA 92101-2937

Dear Sir

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Navy Broadway Complex Project, San Diego, California.

I concur that Alternative A should be the preferred alternative.

1-1

On Figures 3-3, 4-7, and 4-32 the rail line to be retained should be shown to help orient the plan.

1-2

Page 4-38, Public Transit/Transportation, more emphasis should be placed on use of mass transit. With all the parking spaces being provided, will it increase single occupancy vehicle use? I realize that some of the spaces are need for fleet (motor pool) vehicles in the Navy parking areas.

1-3

Page 4-116, section 4.4.2, Fire Protection, why is the time for the Navy Fire Department to travel 3.7 miles (6 minutes) almost the same for the City Fire Department to travel 0.5 miles (4-6 minutes)?

1-4

Page 4-126, section 4.4.7, Solid Waste, what percentage of the figures include recycling? Why is nothing mentioned about recycling to help cut down on solid waste? What percent will be recycled by the Navy?

1-5

Page 4-131, Table 4.5-1, what is the contract number of employees for the service occupation?

1-6

0000009

Harry E Wilson

June 1, 1990

Page 2 of 2

Page 4-134, section 4.3.2 and page 4-113, section 4.4.3, what the percentage of private development will be from private companies moving their offices from other San Diego locations vs new companies moving in from out of the area into the new complex?

I-7

Page 4-146, effects on soil and erosion, what will be the effect of all the soil removed for underground parking, seeing that it will be located in the ground water table? Will leak proof trucks haul it or regular trucks? How wet is the soil? Where will the soil be disposed of?

I-8

Page 4-148, Groundwater, para 2, it states that no long term increases in runoff would occur since the Navy Broadway Complex site is already fully developed with impervious surfaces. Is block 1 their should be some decrease of runoff due to the open space (park). Depending on design of the hotels their should also be open space (lawns).

I-9

Page 4-220, how will it be determined where the dewatered groundwater goes during construction?

I-10

When will the noise and air pollution during construction be considered?

I-11

Thank you for your time and consideration.

Sincerely



Harry E Wilson
2120 N Callow Ave
Bremerton, WA 98312-2908



0000010

County of San Diego

NORMAN W. HICKEY
CHIEF ADMINISTRATIVE OFFICER
(619) 531-8328
Licenses Code 7301

CHIEF ADMINISTRATIVE OFFICE

1600 PACIFIC HIGHWAY, SAN DIEGO, CALIFORNIA 92101-2472

June 1, 1990

Officer in Charge
Western Division Naval Facilities Engineering Command
Detachment
Broadway Complex
555 West Beech Street, Suite 101
San Diego, CA 92101-2937

ATTENTION: Captain Wayne Goodermote, CEC, USN

DRAFT ENVIRONMENTAL IMPACT STATEMENT: NAVY BROADWAY COMPLEX
PROJECT

Dear Captain Goodermote:

We appreciate the opportunity to comment on the draft Environmental Impact Statement (EIS) for the Navy Broadway Complex project.

The County's concern as expressed in our initial comments regarding this project is that the use of off-site, peripheral parking should be utilized by the major water waterfront property owners including the Navy, the County and the Port District to minimize the need for waterfront parking.

The Parking Management Plan for the City of San Diego calls for the establishment of parking interceptor sites located on the periphery of Centre City. The use of such a peripheral structure could provide additional mitigation for traffic and parking impacts generated by the Navy, Santa Fe and other large developments. In addition, it would help to reduce the Navy's parking ratio of 1.23 spaces per 1000 square feet of office space, to the 1.0 spaces per 1000 square feet recommended in the draft Centre City Community Plan.

J-1

J-2

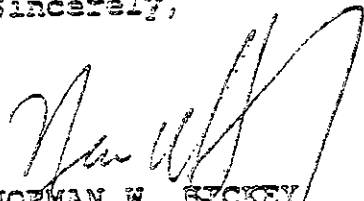
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- 2 -

We appreciate the other measures, including a proposed transportation demand management (TDM) program, which the Navy has incorporated in the project as a means to reduce downtown congestion.] 2-3

If you have any questions on our comments, please contact Rich Robinson, Director of the Office of Special Projects at 531-4348.

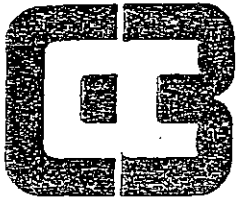
Sincerely,



NORMAN W. BECKEY
Chief Administrative Officer

NWH:br

BC-SIR.NWH



Citizens Coordinate
for
Century 3
1549 El Prado, Rm. 4
San Diego, CA 92101
Tel: (619) 232-7196

00000011

June 4, 1990

Daniel Allen
Wayne Buss
Nico Calavina
Susan A. Carter
Tim Coatsworth
Judith Collins
Diane Barlow Coombs
Charles Cooper
Bruce Dammaon
Emily Durbin
Lois Fong-Sakai
Monie Griffin
Bob Hartman
James Hubbell
Michael Jenkins
Elmer Keen
Mariana Kobrak
Carol Landsman
Bob Laffler
Angeles Leira
Marie Burke Lia
Fred Marks
Hamilton Marston
Linda Michael
Kimball Moore
Kathy N. Schwarz
Philip R. Pryde
Dunham Reilly
Roger Revelle
Karen Seabornough
Max Schmidt
Andrew Spunock
Judy Swink
Joyce Urban
Connie Willens
Don Wood

Captain Wayne K. Goodermote, CEC, USN
Western Division Naval Facilities
Engineering Command Detachment
Broadway Complex
555 West Beech Street, Suite 101
San Diego, CA 92101-2937

Re: EIR/EIS

Dear Captain Goodermote:

C3 is in receipt of the Draft Environmental Impact Report and Statement dated April, 1990 for the Navy Broadway Complex project in San Diego.

Our review of this material together with our participation in the Broadway Complex Coordinating Group has given us a unique opportunity to evaluate the process taken in the development of planning alternatives. While we have been and remain in full support of the Navy's steps to involve professional advisors and the general community in the creation of this project, we are not in agreement with the Navy's preferred alternative (Alternative A) and feel that the EIS has failed to address certain issues that are critical to evaluating the appropriateness of the site.

It is C3's opinion that the City of San Diego may be viewed quite differently today compared with its status in 1983, when the Navy Broadway Complex was first considered. Its increase in population and recognition on an international scale has given the city strategic importance within the United States. As the city has matured, so has its downtown to where private redevelopment has a momentum of its own leaving open space and view corridors in relationship to the bayfront in a vulnerable position. In light of this change, C3 feels that the Navy should not proceed with its proposed public-private venture to the extent that over three million square feet is built on blocks one through four. We believe that funding the approximate one million square feet needed for new Navy office space through Military Construction (MILCON) appropriations is in the best interest of the taxpayer and that minimal privatization should be considered to compliment the site's primary use.

K-1

K-2

00000011

Captain Goodermote
June 4, 1990
Page 2

The fact that approximately 16 acres of under utilized federal land exists at the terminus of the central business district is very fortunate. In context to our nation's capital, this property presents a similar potential in architecture and landscape design that was available to L'Enfant when Washington, D.C. was first layed out beside the Potomac River. Its highest and best use will be obtained by retaining the open space resource and not giving it up for high intensity, income producing development that presents a financial risk to the public and draws demand away from other more suitably placed commercial projects that provide tax increment funds and developer fees to the city of San Diego.

K-3

The Environmental Impact Statement draws the conclusion that Alternative A will "maximize community objectives and provide for a number of beneficial uses." Unfortunately, it reaches this opinion without providing an economic feasibility study. Why, for instance, is a residential use not possible? Will the Port of San Diego require compensation in exchange for providing park space? Moreover, what is the projected total budget for U.S. military construction through the year 2003 compared with the cost of erecting approximately one million square feet of building using the urban design guidelines for Centre City?

K-4

K-5

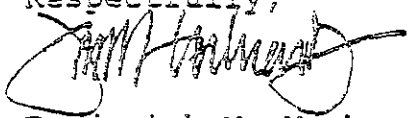
K-6

C3's basic concern is that the EIS is not objective enough. Ultimately, it should challenge more of the parameters and principles set down by the Navy. We are hopeful that this will follow.

K-7

C3 wishes to thank you for allowing us to comment on the proposed Broadway Complex.

Respectfully,


Frederick M. Marks, Chairman
Centre City Committee

FMM/lgs

cc: Pete Wilson
Bill Lowery
Abbe Wolfsheiner
H. Wes Pratt
Judy McCarty
Larry Monserrate
Ernest Rahn

Jim Bates
Brian Bilbray
Ron Roberts
Linda Bernhardt
Bob Filner
Maureen Stapleton
Don Nay

Duncan Hunter
Maureen O'Connor
John Hartley
J. Bruce Henderson
Mike Stepner
John Davies



State of California

0000012

GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

GEORGE DEUKMEJIAN
GOVERNOR

(916) 323-7480

DATE: June 4, 1990

TO: U. S. Department of the Navy
Western Division
Naval Facilities Engineering Command
ATTN: Officer in Charge, Broadway Complex
555 West Beach Street, Suite 101
San Diego, CA 92101-2937

FROM: Office of Planning and Research
State Clearinghouse

RE: Draft Environmental Impact Report/Statement for the Navy
Broadway Complex Project, San Diego County
(SCH 88110208)

As the designated California Single Point of Contact, pursuant to Executive Order 12372, the Office of Planning and Research transmits attached comments as the State Process Recommendation.

This recommendation is a consensus; no opposing comments have been received. Initiation of the "accommodate or explain" response by your agency is, therefore, in effect.

Sincerely,

Robert P. Martinez
Director

Attachment

cc: Applicant

Resources Building
1416 Ninth Street
95814

(916) 445-5656
TDD (916) 324-0804

California Conservation Corps
Department of Boating and Waterways
Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Parks and Recreation
Department of Water Resources

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA



THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

Air Resources Board
California Coastal Commission
California Tahoe Conservancy
California Waste Management
Board
Colorado River Board
Energy Resources Conservation
And Development Commission
San Francisco Bay Conservation
And Development Commission
State Coastal Conservancy
State Lands Division
State Reclamation Board
State Water Resources Control
Board
Regional Water Quality
Control Boards

U. S. Department of the Navy
Western Division
Naval Facilities Engineering Command
ATTN: Officer in Charge, Broadway Complex
555 West Beech Street, Suite 101
San Diego, CA 92101-2937

June 4, 1990

Dear Sir:

The State has reviewed the Draft Environmental Impact Report/
Statement for the Navy Broadway Complex Project, San Diego
County, submitted through the Office of Planning and Research.

We coordinated review of this document with the California
Coastal, State Lands Commissions, the Air Resources Board, the
San Diego Regional Water Quality Control Boards, and the
Departments of Fish and Game, Parks and Recreation, and
Transportation.

The Department of Conservation has provided the attached comments
for your consideration.

The State Lands Commission responded directly in correspondence
dated June 4, 1990. After contacting the Officer in Charge, the
California Coastal Commission states they will be commenting
directly.

The San Diego Regional Water Quality Control Board states that
they are currently working with the Navy on this project.

Thank you for providing an opportunity to review this project.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gordon F. Snow".
Gordon F. Snow, Ph.D.
Assistant Secretary for Resources

Attachment

cc: (See attached list.)

M-1

00000012

U. S. Department of the Navy

-2-

June 4, 1990

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814
(SCH 88110208)

Memorandum

To : Dr. Gordon F. Snow
Assistant Secretary for Resources

Date : May 24, 1990

Capt. Wayne Goodermote
City of San Diego & U.S. Dept. of the Navy
535 West Beech Street, Suite 101
San Diego, CA 92101-2937

Subject: Draft Environmental
Impact Statement for
the Navy Broadway
Complex,
SCH# 88110208

From : Department of Conservation—Office of the Director

The Department of Conservation's Division of Mines and Geology (DMG) has reviewed the Draft Environmental Impact Statement (EIS) for the Navy's Broadway Complex, located in the City of San Diego, California. This Draft EIS is intended to fulfill the requirement of both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). The Draft EIS analyses the impacts from the redevelopment of approximately 15.6 acres in downtown San Diego, near the waterfront. The proposed redevelopment will include up to 1 million square feet of Navy administrative offices and 2.145 million square feet of mixed private office, commercial and retail uses. The following report was reviewed by DMG:

- o Draft Environmental Impact Statement, Navy Broadway Complex Project, San Diego, California, April 1990, SCH# 88110208.

Based on our review of this report, we offer the following comments:

1. The Draft EIS has not adequately described the extent and the mitigative measures for the geologic and seismic hazards affecting the project. No geotechnical data is provided to demonstrate that sufficient analysis of the project's geologic or seismic setting has been performed to assess the potential for ground shaking, surface rupture, liquefaction, lateral spreading, inundation, or settlement from seismic events on nearby faults. The Draft EIS references a geotechnical study by Hirsch and Associates, 1988, but the report is not appended. Although the Draft EIS summarizes the results of the geotechnical study, no site-specific methods are given for mitigating the geologic and seismic hazards at the project site.

M-1

Therefore, site-specific studies to determine the methods of mitigation for seismic or geologic hazards should be done as a part of the NEPA process, and should be included in the final EIS. All technical data should be appended to the final EIS.

Dr. Snow/Capt. Goodermote

May 24, 1990

Page Two

2. No data is presented in the Draft EIS on the level of ground shaking expected at the project site. The project site is located adjacent to the Rose Canyon Fault. This Fault is considered active, having maximum credible earthquakes (MCE) of magnitude 7.0 (Wesnowsky, 1986; Anderson, et al, 1989). Earthquakes on other active faults, such as the Coronado Banks and Elsinore Faults, may also affect the project site. A recent evaluation indicates that the Coronado Banks Fault has a MCE of magnitude 7-3/4 (Anderson, et al, 1989).

Therefore, additional data is needed on the potential impacts and proposed mitigation measures from ground shaking due to large earthquakes on nearby active faults. The Final EIS should provide estimates of potential strong ground motion at the site, surface rupture, liquefaction, seismic-induced settlement, and failure from shaking of dock facilities and retaining walls. Data on the expected ground motion parameters should include, peak ground acceleration, duration of strong shaking, and site period. Data to support the analysis should be included in the Final EIS. If methods of mitigation are needed, they should be developed for inclusion in the Final EIS so that they can be reviewed.

N-2

3. The Draft EIS does not adequately address the potential for liquefaction at the project site. The Draft EIS states only that the project site has a potential for liquefaction. The soils underlying the site apparently consist of hydraulic fill over bay mud, which typically have a moderate to high potential for liquefaction. No site-specific methods are given for mitigating liquefaction. The only mitigation given is the statement that the project site is at the same risk from liquefaction as the rest of San Diego Bay.

Therefore, additional information should be developed on the potential for liquefaction, lateral spreading, seismic and differential settlement at the project. Site-specific geotechnical data is needed to properly evaluate the potential for liquefaction at the project site. In particular, information on any soil intervals expected to liquefy and the areal extent of these liquefiable soils should be included in the Final EIS. Site-specific methods of mitigation should be proposed within the context of this new information.

N-3

4. The Draft EIS does not address the impacts to the project from inundation due to a tsunami or seiche. The San Diego City Seismic Safety Element indicates that the project site

N-4